EPA Registration No. 83923-4 vol. 1

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

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February 7, 2011

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**FNL LBL**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex IV, Inc. – Prothor SC 2 (EPA Reg. No. 83923-4)
Submission of Final Product Labeling per the Agency Letter dated December 22, 2010

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. and in response to the Agency letter dated December 22, 2010 please find enclosed the final product labeling for Prothor SC 2 (EPA Reg. No. 83923-4).

In support of this submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Prothor SC 2 final product labeling

Please feel free to contact me by phone (253) 853-7369 or by email at Ross@PyxisRC.com if you have any questions or need any additional information.

Sincerely,

Ross Gilbert

Enclosures

cc: D. Nimocks; Ensystex IV, Inc.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [ ] Amendment
- [x] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number: 83293-4

2. EPA Product Manager: V. Eagle

3. Proposed Classification: [x] None [ ] Restricted

4. Company/Product (Name): Ensystex IV, Inc. / Prothor SC 2

PM#: 01

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
[ ] *Check if this is a new address*

6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [x] Final printed labels in repsonse to Agency letter dated December 22, 2010
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Submission of final product label per the Agency letter dated December 22, 2010.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify)
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information: [ ] Label [x] Container

4. Size(s) Retail Container: 2.15 gallon

5. Location of Label Directions: [x] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product: [x] Lithograph Paper glued Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Ross Gilbert	Agent	(253) 853-7369

Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

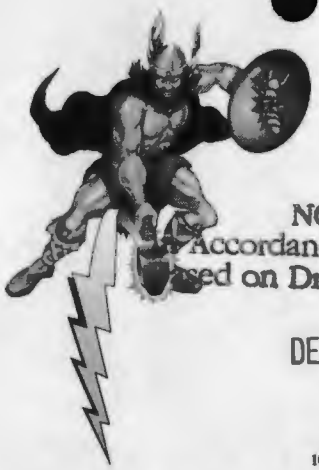
2. Signature: Ross Gilbert

3. Title: Agent

4. Typed Name: Ross Gilbert

5. Date: 2/7/2011.

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy



NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

DEC 2 2 2010

10/10

PROTHOR SC 2

For use only by individuals/firms licensed or registered by the state to apply termiticide, turf maintenance and/or landscaping/ornamental products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	**By Wt.**
Imidacloprid	21.4%
Other Ingredients:	78.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-4 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:
ENSYSTEX IV, Inc.
Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment for Termite Control Uses: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and water-proof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Personal Protective Equipment for non-Termite Control Uses: Applicators and other handlers must wear a long-

sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

Apply this product only as specified on this label.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician must be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes*. The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table

level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for specified distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 2* or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC 2*. Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

PROTHOR SC 2 may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2		
Solution Percentage Concentration Desired	**Gallons of Finished Solution Desired**	**Fluid Ounces of PROTHOR SC 2 to add**
0.05%	1	0.28
	2	0.55
	5	1.38
	25	6.90
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
	1000	275.0 (2 gallons + 19 ounces)
0.10%	1	0.55
	2	1.10
	5	2.75
	25	13.8
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = A x 0.275

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = A x 0.55

Proportional Injector Mixing Table For PROTHOR SC 2	
Solution Percentage Concentration Desired	**Injector Volume (fluid ounces per gallon)**
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes must not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes msut not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical

conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to not puncture these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes must be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes must be spaced so as to achieve a continuous chemical barrier. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl

spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

When drilling veneer walls, care must be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Restriction: Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment specifications listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is

equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

6.90 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 13.80 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 2 to Add to Water	Expansion Ratios
25	1.0	6.90 ounces	25:1
25	2.5	6.90 ounces	10:1
25	5.0	6.90 ounces	5:1
50	1.0	13.80 ounces	50:1
50	2.5	13.80 ounces	20:1
50	5.0	13.80 ounces	10:1

*Add the foaming agent manufacturer's specified amount of foaming agent to solution after water and PROTHOR SC 2 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 2 before mixing or using with PROTHOR SC 2.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 2 (see Foam Mixing Instructions) may be converted into a predetermined amount of foam according to the foaming agent and foaming equipment manufacturer's specifications. Verify that the foaming agent is compatible with PROTHOR SC 2.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the specified volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 2 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the specified rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however do not allow excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Restrictions: Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Restrictions: Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

APPLICATION FOR TURF PESTS

PROTHOR SC 2 controls or suppresses a wide range of soil inhabiting turfgrass insect pests.

Restrictions: PROTHOR SC 2 is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research. Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

Application Sites

Permitted sites include lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in PROTHOR SC 2, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Irrigate if rainfall does not occur within 24 hours. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Restrictions

Keep children and pets off treated areas until spray has dried.

Application Preparations

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount PROTHOR SC 2 mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply PROTHOR SC 2 solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply PROTHOR SC 2.

Turf Application Use Rates

Use Rate Table for PROTHOR SC 2 for Turf Applications

Use Rate	Amount of PROTHOR SC 2 per 1,000 sq. feet
A	1.25 to 1.6 pt per acre or 0.46 to 0.6 fl oz (14 to 17 ml) per 1000 sq. ft..
B	1.6 pt per acre or 0.6 fl oz (17 ml) per 1000 sq. ft.

Turf Application Volumes

The calculated amount of PROTHOR SC 2 can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass ataenius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Applications Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with PROTHOR SC 2 if adults or large nymphs are present and tunneling at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **Restriction:** PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Restriction: Do not apply through any irrigation system.

Foliar Application

Foliar application of PROTHOR SC 2 offers local systemic activity against insect pests. The use of a spreader/sticker may help applications to plants with hard to wet foliage such as holly, pine or ivy.

Ornamental Application to Control Ants

PROTHOR SC 2 can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of PROTHOR SC 2 (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for PROTHOR SC 2 for Foliar Applications
1.5 fl oz (45 ml) per 100 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for PROTHOR SC 2 for Broadcast Applications
0.46 to 0.6 fl oz (14 to 17 ml) per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2

gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **Restriction:** PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around the perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks. public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Do not allow runoff or puddling of irrigation water following application. Do not apply to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Injection for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Drench for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Injection for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Drench for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

RESTRICTIONS

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soil in areas where edible plants may be planted.
- Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

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Revised 10/10

Soil Injection Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Injection for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Drench for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

RESTRICTIONS

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soil in areas where edible plants may be planted.
- Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

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January 11, 2011

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**FNL LBL**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex IV, Inc. – Prothor SC 2 (EPA Reg. No. 83923-4)
Submission of Final Product Labeling per the Agency Letter dated December 22, 2010

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. and in response to the Agency letter dated December 22, 2010 please find enclosed the final product labeling for Prothor SC 2 (EPA Reg. No. 83923-4).

In support of this submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Prothor SC 2 final product labeling
3. Letter of Authorization

Please feel free to contact me by phone (253) 853-7369 or by email at Ross@PyxisRC.com if you have any questions or need any additional information.

Sincerely,

Ross Gilbert

Enclosures

cc: D. Nimmocks; Ensystex IV, Inc.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☑ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83293-4	V. Eagle	☑ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 2	01	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☑ Final printed labels in repsonse to Agency letter dated December 22, 2010
☐ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Submission of final product label per the Agency letter dated December 22, 2010.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☑ No	☐ Yes ☑ No	☐ Yes ☑ No	☐ Metal ☑ Plastic ☐ Glass ☐ Paper ☐ Other (Specify)
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☐ Label ☑ Container	2.15 gallon	☑ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☑ Lithograph Paper glued Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

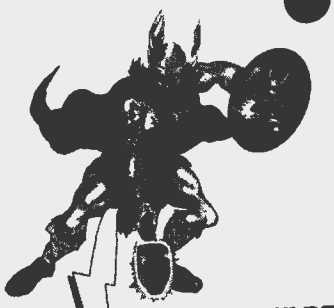
Name	Title	Telephone No. (Include Area Code)
Ross Gilbert	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingliy false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
Hilbert	Agent
4. Typed Name	**5. Date**
Ross Gilbert	1/11/2011



NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

DEC 2 2 2010

PROTHOR SC 2

For use only by individuals/firms licensed or registered by the state to apply termiticide, turf maintenance and/or landscaping/ornamental products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	**By Wt.**
Imidacloprid	21.4%
Other Ingredients:	78.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-4 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:
ENSYSTEX IV, Inc.
Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment for Termite Control Uses: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and water-proof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Personal Protective Equipment for non-Termite Control Uses: Applicators and other handlers must wear a long-

sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

Apply this product only as specified on this label.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician must be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes.* The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table

level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for specified distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 2* or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC 2*. Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

PROTHOR SC 2 may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 2 to add
0.05%	1	0.28
	2	0.55
	5	1.38
	25	6.90
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
	1000	275.0 (2 gallons + 19 ounces)
0.10%	1	0.55
	2	1.10
	5	2.75
	25	13.8
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = A x 0.275

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = A x 0.55

Proportional Injector Mixing Table For PROTHOR SC 2

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes must not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes msut not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical

conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to not puncture these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes must be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes must be spaced so as to achieve a continuous chemical barrier. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl

spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

When drilling veneer walls, care must be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Restriction: Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment specifications listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is

equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

6.90 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 13.80 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 2 to Add to Water	Expansion Ratios
25	1.0	6.90 ounces	25:1
25	2.5	6.90 ounces	10:1
25	5.0	6.90 ounces	5:1
50	1.0	13.80 ounces	50:1
50	2.5	13.80 ounces	20:1
50	5.0	13.80 ounces	10:1

*Add the foaming agent manufacturer's specified amount of foaming agent to solution after water and PROTHOR SC 2 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 2 before mixing or using with PROTHOR SC 2.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 2 (see Foam Mixing Instructions) may be converted into a predetermined amount of foam according to the foaming agent and foaming equipment manufacturer's specifications. Verify that the foaming agent is compatible with PROTHOR SC 2.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the specified volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 2 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the specified rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however do not allow excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Restrictions: Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Restrictions: Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

APPLICATION FOR TURF PESTS

PROTHOR SC 2 controls or suppresses a wide range of soil inhabiting turfgrass insect pests.

Restrictions: PROTHOR SC 2 is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research. Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

Application Sites

Permitted sites include lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in PROTHOR SC 2, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Irrigate if rainfall does not occur within 24 hours. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Restrictions

Keep children and pets off treated areas until spray has dried.

Application Preparations

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount PROTHOR SC 2 mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply PROTHOR SC 2 solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply PROTHOR SC 2.

Turf Application Use Rates

Use Rate Table for PROTHOR SC 2 for Turf Applications

Use Rate	Amount of PROTHOR SC 2 per 1,000 sq. feet
A	1.25 to 1.6 pt per acre or 0.46 to 0.6 fl oz (14 to 17 ml) per 1000 sq. ft..
B	1.6 pt per acre or 0.6 fl oz (17 ml) per 1000 sq. ft.

Turf Application Volumes

The calculated amount of PROTHOR SC 2 can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass ataenius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Applications Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with PROTHOR SC 2 if adults or large nymphs are present and tunneling at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **Restriction:** PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Restriction: Do not apply through any irrigation system.

Foliar Application

Foliar application of PROTHOR SC 2 offers local systemic activity against insect pests. The use of a spreader/sticker may help applications to plants with hard to wet foliage such as holly, pine or ivy.

Ornamental Application to Control Ants

PROTHOR SC 2 can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of PROTHOR SC 2 (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for PROTHOR SC 2 for Foliar Applications
1.5 fl oz (45 ml) per 100 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for PROTHOR SC 2 for Broadcast Applications
0.46 to 0.6 fl oz (14 to 17 ml) per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2

gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **Restriction:** PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around the perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks. public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Do not allow runoff or puddling of irrigation water following application. Do not apply to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Injection for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Drench for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Injection for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Drench for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

RESTRICTIONS

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soil in areas where edible plants may be planted.
- Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

Revised 10/10

ENSYSTEX, Inc.

2713 Breezewood Ave., Fayetteville, NC 28303 USA
Telephone - 1-910-485-5720 x 5203 Fax - 1-888-368-4749 email david@ensystex.com

August 13, 2007

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensystex, Inc. (EPA Company Number 68850), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary

Signed and Sworn before me this 13th day of August 2007.

My commission expires May 20, 2008

Linda M Barber
Notary Public

LINDA M. BARBER NOTARY PUBLIC CUMBERLAND COUNTY, NC

State of NC
County of Cumberland.

Material to be added to an e-Jacket/Jacket

Reg. No. 83923-4 Decision # 443415

Description:
new stamped label

1. Placement within the e-Jacket/jacket:
   - ☐ Default: (chronological, top = newest)
   - ☐ File Location: (eg. "before page 45 in .pdf")

2. ☑ Send to Data Extraction contractors this material:
   - ☑ Newly stamped accepted label
   - ☐ Notification
   - ☐ New CSF
   - ☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: [signature] Division: RD

Phone: 386-0415 Date: 12-22-10

Created December 22, 2010

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ross Gilbert
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

DEC 22 2010

Dear Mr. Ross:

Subject: Labeling Amendment; Revisions Per Agency Letter Dated 11/9/10
Prothor SC 2
EPA Registration No. 83923-4
Submission Date: December 20, 2010

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact Kable Bo Davis at (703) 306-0415 or davis.kable @epa.gov.

Sincerely yours,

Venus Eagle for
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure- Stamped Label

ACCEPTED

DEC 22

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 83923-4

PROTHOR SC 2

For use as a termiticide only by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product as a termiticide. If necessary, consult the structural pest control regulatory agency of your state prior to use of this product as a termiticide.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

For foliar and systemic control of listed insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	**By Wt.**
Imidacloprid	21.4%
Other Ingredients:	78.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-4 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

NET CONTENTS: As marked on container

Manufactured by:
ENSYSTEX IV, Inc.
Fayetteville, NC 28303
1-888-398-3772

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment for Termite Control Uses: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and water-proof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Personal Protective Equipment for non-Termite Control Uses: Applicators and other handlers must wear a long-sleeved shirt and long pants, socks, shoes, and chemical-

resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

Apply this product only as specified on this label.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Not for use on plants being grown for sale or other commercial use, for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in ornamental gardens or parks, or on golf courses or lawns and grounds.

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician must be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes*. The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table

level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for specified distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 2* or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC 2*. Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

PROTHOR SC 2 may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 2 to add
0.05%	1	0.28
	2	0.55
	5	1.38
	25	6.90
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
	1000	275.0 (2 gallons + 19 ounces)
0.10%	1	0.55
	2	1.10
	5	2.75
	25	13.8
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = A x 0.275

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = A x 0.55

Proportional Injector Mixing Table For PROTHOR SC 2

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes must not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes must not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical

conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to not puncture these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) Including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes must be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes must be spaced so as to achieve a continuous chemical barrier. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl

spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

When drilling veneer walls, care must be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Restriction: Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment specifications listed below prior to making an application.

1. . Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is

equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

6.90 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 13.80 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 2 to Add to Water	Expansion Ratios
25	1.0	6.90 ounces	25:1
25	2.5	6.90 ounces	10:1
25	5.0	6.90 ounces	5:1
50	1.0	13.80 ounces	50:1
50	2.5	13.80 ounces	20:1
50	5.0	13.80 ounces	10:1

*Add the foaming agent manufacturer's specified amount of foaming agent to solution after water and PROTHOR SC 2 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 2 before mixing or using with PROTHOR SC 2.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 2 (see Foam Mixing Instructions) may be converted into a predetermined amount of foam according to the foaming agent and foaming equipment manufacturer's specifications. Verify that the foaming agent is compatible with PROTHOR SC 2.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the specified volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 2 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the specified rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however do not allow excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Restrictions: Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Restrictions: Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

APPLICATION FOR TURF PESTS

Applications to turfgrass cannot exceed a total of 0.4 lb of active ingredient per acre per year.

PROTHOR SC 2 controls or suppresses listed insect pests.

Restrictions: PROTHOR SC 2 is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research. Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

Application Sites

Permitted sites include lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in PROTHOR SC 2, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Irrigate if rainfall does not occur within 24 hours. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Restrictions

Keep children and pets off treated areas until spray has dried.

Application Preparations

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount PROTHOR SC 2 mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply PROTHOR SC 2 solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply PROTHOR SC 2.

Turf Application Use Rates

Use Rate Table for PROTHOR SC 2 for Turf

Applications	
Use Rate	**Amount of PROTHOR SC 2 per 1,000 sq. feet**
A	1.25 to 1.6 pt per acre or 0.46 to 0.6 fl oz (14 to 17 ml) per 1000 sq. ft..
B	1.6 pt per acre or 0.6 fl oz (17 ml) per 1000 sq. ft.

Turf Application Volumes

The calculated amount of PROTHOR SC 2 can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass ataenius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Applications Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with PROTHOR SC 2 if adults or large nymphs are present and tunneling at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

For outdoor ornamentals, broadcast applications cannot exceed a total of 0.4 lb of active ingredient per acre per year.

PROTHOR SC 2, applied to foliage and broadcast on the soil, controls listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **Restriction:** PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Restriction: Do not apply through any irrigation system.

Foliar Application

Foliar application of PROTHOR SC 2 offers local systemic activity against insect pests. The use of a spreader/sticker may help applications to plants with hard to wet foliage such as holly, pine or ivy.

Ornamental Application to Control Ants

PROTHOR SC 2 can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of PROTHOR SC 2 (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for PROTHOR SC 2 for Foliar Applications
1.5 fl oz (45 ml) per 100 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for PROTHOR SC 2 for Broadcast Applications
0.46 to 0.6 fl oz (14 to 17 ml) per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied as a soil drench or soil injection, controls listed insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **Restriction:** PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around the perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks. public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Do not allow runoff or puddling of irrigation water following application. Do not apply to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Injection for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Drench for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Injection for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Drench for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

RESTRICTIONS

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soil in areas where edible plants may be planted.
- Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

Revised 12/10

Fw: Prothor SC2 - - resubmission
Venus Eagle to: Kable Davis 12/21/2010 09:48 AM

Hi Bo,

Hope you are not reading your e:mail from home, but it so - - I hope you are feeling way better than yesterday. Take it easy and try some dry toast with tea or chicken broth if you think you can hold it down.....it always made me feel better. We'll miss you at the party today!

Anyway, when you get back to the office - - below is an easy action as requested :-). This is the resubmission for the Prothor product where I told them I wouldn't issue the gold seal until the label and website changes were made. I will ask Betty to draft the gold seal so it is ready to go when you stamp off on the new label.

Thanks much,

Venus

Venus Eagle
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division
(703) 308-8045
---- Forwarded by Venus Eagle/DC/USEPA/US on 12/21/2010 09:41 AM ----

From:	Ken Kendall <kkendall@ensystex.com>
To:	Venus Eagle/DC/USEPA/US@EPA
Date:	12/21/2010 07:41 AM
Subject:	Fwd: RE: Prothor SC2

Venus,
Here is the submission from Pyxis for Prothor SC2. Let me know if you need anything else.
Thanks,
Ken

-------- Original Message --------
Subject: RE: Prothor SC2

Date: Mon, 20 Dec 2010 13:19:38 -0800
From: Ross Gilbert <Ross@PyxisRC.com>
To: Ken Kendall <kkendall@ensystex.com>
CC: David@ensystex.com <David@ensystex.com>, Mike Kellogg <Mike@PyxisRC.com>

Ken,

Copy of the submission (less 4 copies of the changes incorporated label) attached.

Let me know if you need anything else.

Best,

Ross

Ross Gilbert
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
E: Ross@PyxisRC.com
T: 1-253-853-7369
F: 1-253-853-5516

-----Original Message-----
From: Ken Kendall [mailto:kkendall@ensystex.com]
Sent: Monday, December 20, 2010 11:29 AM
To: Ross Gilbert; Mike Kellogg
Subject: Prothor SC2

Ross,
As soon as you get the paperwork done would you e-mail me a copy of the
application and the label as being submitted. I will e-mail these to
Venus Eagle who requested that we update the label before she sends us
the Gold Seal label.
Thanks,
Ken

20101220
prothor sc 2
resubmission.pdf

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

December 20, 2010

COURIER DELIVERY

Bo Davis/Venus Eagle (Team 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (83923-4)
Response to EPA Letter Dated November 9, 2010

Dear Mr. Davis,

On behalf of Ensystex IV, Inc. (Ensystex) please find the enclosed revision to the labeling of Prothor SC 2 (EPA Reg. No. 83923-4). This submission is in response to the EPA's letter dated November 9, 2010.

In support of this resubmission, please find the following documents:

1. Application for Amendment (EPA Form 8570-1)
2. One (1) copy of the revised drafted labeling with changes tracked
3. Five (5) copies of the revised drafted labeling with changes incorporated
4. Certification With Respect to Label Integrity
5. One (1) copy of the revised draft label on CD

In addition to the changes detailed in the EPA's letter dated November 9, 2010, Ensystex IV, Inc. have made some minor changes to the first paragraph of the label, on page 1 immediately following the product name. The changes are reflected in both changes tracked and changes incorporated versions of the label enclosed.

Please contact me if you have any questions or need any additional information.

Sincerely,

Ross Gilbert

Enclosures

cc: D. Nimocks; Ensystex IV, Inc.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [ ] Amendment
- [x] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83923-4	V. Eagle	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 2	01	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [x] Resubmission in response to Agency letter dated Nov 9, 2010
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Revision to the labeling of Prothor SC 2 (EPA Reg. No. 83923-4) in response to the EPA's letter dated November 9, 2010.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [x] Container	2.15 gallons	[x] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [ ] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Ross Gilbert	Agent	(253) 853-7369

Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	4. Typed Name	5. Date
[signature]	Agent	Ross Gilbert	12/20/2010.

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL

EPA Registration #	Date Submitted to EPA	Electronic file name
83923-4	December 20, 2010	083923-00004.20101220.Prothor SC 2 label revision.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature

12/20/2010
Date

Ross Gilbert

Name (typed)

Agent

Title

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ross Gilbert
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

NOV 9 2010

Dear Mr. Ross:

Subject: Labeling Amendment; Deletion of Emerald Ash Borer
Prothor SC 2
EPA Registration No. 83923-4
Submission Date: October 26, 2010

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is not acceptable. The following changes are required in the proposed labeling:

1. On the first page of the label, revise "*For use only by individuals/firms licensed or registered by the state to apply termiticide, turf maintenance and/or landscaping/ornamental products.*" to read "*For use only by individuals/firms licensed or registered by the state to apply termiticide products.*"

2. On the first page of the label, revise "*For foliar and systemic control of insect pests of turfgrass, landscape ornamentals...*" to read "*For foliar and systemic control of listed insect pests of turfgrass, landscape ornamentals...*"

3. It is suggested that a company phone number be included directly below the company address on the first page of the label.

4. Within the **DIRECTIONS FOR USE** section of the label, include the following language:

   "*Not for use on plants being grown for sale or other commercial use, for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in ornamental gardens or parks, or on golf courses or lawns and grounds.*

   Not for use on turf being grown for sales or other commercial use as sod, or for commercial seed production, or for research purposes."

5. Within the **Crawl Spaces** section of the label (page 4), revise "*msut*" to read "*must*".

6. Within the **FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS** section of the label (page 9), revise "*PROTHOR SC 2, applied to foliage and broadcast on the soil, controls a wide range of insects on trees...*" to read "*PROTHOR SC 2, applied to foliage and broadcast on the soil, controls listed insects on trees...*"

7. Within the **Application Sites** section of the label (page 9), revise "*Permitted sites include but are not limited to landscapes...*" to read "*Permitted sites include landscapes...*"

8. Within the **SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS** section of the label (page 10), revise "*PROTHOR SC 2, applied as a soil drench or soil injection, controls a wide range of insects on trees...*" to read "*PROTHOR SC 2, applied as a soil drench or soil injection, controls listed insects on trees...*"

9. Within the **Application Sites** section of the label (page 10), revise "*Permitted sites include but are not limited to landscapes...*" to read "*Permitted sites include landscapes...*"

10. Within the **APPLICATION FOR TURF PESTS** section of the label (page 8), revise "*PROTHOR SC 2 controls or suppresses a wide range of soil inhabiting turfgrass insect pests.*" to read "*PROTHOR SC 2 controls or suppresses listed insect pests.*"

11. Within **the APPLICATIONS FOR TURG PESTS** section of the label (page 8), include "*Applications to turfgrass cannot exceed a total of 0.4 lb of active ingredient per acre per year.*"

12. Within the **FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS** section of the label (page 9), include "*For outdoor ornamentals, broadcast applications cannot exceed a total of 0.4 lb of active ingredient per acre per year.*"

13. In review of the company website (www.for-thor.com; referenced on the first page of the label), the following revisions are required.
    a. All references to "*Prothor Viral Effect*" must be deleted as this claims exceeds the claims found on the approved label. As a result, the phrase "*Prothor Viral Effect*" is considered false and misleading.

Please submit five (5) copies of revised draft labeling, incorporating the changes indicated above. If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 306-0415 or davis.kable@epa.gov.

Sincerely yours,

Venus Eagle

Venus Eagle
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

10/10

Not Accepted

PROTHOR SC 2

For use only by individuals/firms licensed or registered by the state to apply termiticide, turf maintenance and/or landscaping/ornamental products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	**By Wt.**
Imidacloprid	21.4%
Other Ingredients:	78.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-4 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:
ENSYSTEX IV, Inc.
Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment for Termite Control Uses: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and water-proof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Personal Protective Equipment for non-Termite Control Uses: Applicators and other handlers must wear a long-

- sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

Apply this product only as specified on this label.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Not for use on plants being grown for sale or other commercial use or for commercial seed production or for research purposes. For use on plants intended for aesthetic purposes or climatic modification + being grown in ornamental gardens, or parks, or on golf courses, or lawns and grounds, or residential fruit + nut trees.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician must be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes.* The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table

level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for specified distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 2* or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC 2*. Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

PROTHOR SC 2 may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2		
Solution Percentage Concentration Desired	**Gallons of Finished Solution Desired**	**Fluid Ounces of PROTHOR SC 2 to add**
0.05%	1	0.28
	2	0.55
	5	1.38
	25	6.90
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
	1000	275.0 (2 gallons + 19 ounces)
0.10%	1	0.55
	2	1.10
	5	2.75
	25	13.8
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = A x 0.275

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = A x 0.55

Proportional Injector Mixing Table For PROTHOR SC 2	
Solution Percentage Concentration Desired	**Injector Volume (fluid ounces per gallon)**
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

- **Adjustments to Application Volume**

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes must not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes msut not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical

conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to not puncture these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes must be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes must be spaced so as to achieve a continuous chemical barrier. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl

spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

When drilling veneer walls, care must be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Restriction: Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment specifications listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is

- equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

6.90 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 13.80 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 2 to Add to Water	Expansion Ratios
25	1.0	6.90 ounces	25:1
25	2.5	6.90 ounces	10:1
25	5.0	6.90 ounces	5:1
50	1.0	13.80 ounces	50:1
50	2.5	13.80 ounces	20:1
50	5.0	13.80 ounces	10:1

*Add the foaming agent manufacturer's specified amount of foaming agent to solution after water and PROTHOR SC 2 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 2 before mixing or using with PROTHOR SC 2.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 2 (see Foam Mixing Instructions) may be converted into a predetermined amount of foam according to the foaming agent and foaming equipment manufacturer's specifications. Verify that the foaming agent is compatible with PROTHOR SC 2.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the specified volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 2 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the specified rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however do not allow excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Restrictions: Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Restrictions: Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

APPLICATION FOR TURF PESTS

PROTHOR SC 2 controls or suppresses a wide range of soil inhabiting turfgrass insect pests.

Restrictions: PROTHOR SC 2 is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research. Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

Application Sites

Permitted sites include lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in PROTHOR SC 2, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Irrigate if rainfall does not occur within 24 hours. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Restrictions

Keep children and pets off treated areas until spray has dried.

Application Preparations

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount PROTHOR SC 2 mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply PROTHOR SC 2 solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply PROTHOR SC 2.

Turf Application Use Rates

Use Rate Table for PROTHOR SC 2 for Turf Applications

Use Rate	Amount of PROTHOR SC 2 per 1,000 sq. feet
A	1.25 to 1.6 pt per acre or 0.46 to 0.6 fl oz (14 to 17 ml) per 1000 sq. ft..
B	1.6 pt per acre or 0.6 fl oz (17 ml) per 1000 sq. ft.

Turf Application Volumes

The calculated amount of PROTHOR SC 2 can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass ataenius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Applications Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with PROTHOR SC 2 if adults or large nymphs are present and tunneling at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **Restriction:** PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Restriction: Do not apply through any irrigation system.

Foliar Application

Foliar application of PROTHOR SC 2 offers local systemic activity against insect pests. The use of a spreader/sticker may help applications to plants with hard to wet foliage such as holly, pine or ivy.

Ornamental Application to Control Ants

PROTHOR SC 2 can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of PROTHOR SC 2 (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for PROTHOR SC 2 for Foliar Applications
1.5 fl oz (45 ml) per 100 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for PROTHOR SC 2 for Broadcast Applications
0.46 to 0.6 fl oz (14 to 17 ml) per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2

- gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **Restriction:** PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around the perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks. public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Do not allow runoff or puddling of irrigation water following application. Do not apply to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Injection for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Drench for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

- **Soil Injection Use Rate for Shrubs**

Use Rate Table for PROTHOR SC 2 for Soil Injection for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Drench for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

RESTRICTIONS

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soil in areas where edible plants may be planted.
- Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

Revised 10/10

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Prothor

Prothor SC2 Label
Prothor WSP Label

REQUEST INFORMATION

Ensystex is a leader in products to the pest control professional with headquarters in the USA.

Listen to what our customers are saying:

"I love Ensystex, they are the best. I haven't had a termite problem at a clients home in years! Thanks Ensystex!"

Request Info

The Power of Non-repellent Imidacloprid. The Advantages of THOR.

Some termiticides work by not letting termites pass through an area that has been treated with them. Termites, when they encounter soil treated with this type of termiticide are repelled. These termiticides are referred to as repellents.

Let Them Pass

In contrast, some termiticides work by allowing termites to "pass through", thereby setting a deadly trap. These termiticides that allow termites to pass through are referred to as non-repellents. Imidacloprid belongs to the non-repellent group of termiticides. You might wonder, why is it an advantage to not repel termites ants to instead let them pass? Here's why.

When applied to the soil at recommended concentrations, termites can't detect imidacloprid in the soil. This means termites foraging in imidacloprid treated soil for food are not repelled but instead pass through it like the imidacloprid isn't even there. This penetration results in these foraging termites being exposed to imidacloprid which transfers from the soil onto the exterior of their bodies. Because the toxic action of imidacloprid is delayed, only later are the imidacloprid contaminated termites killed by their exposure to imidacloprid treated soil. For this reason, imidacloprid is referred to as a non-repellent termiticide.

The Prothor Viral Effect

If imidacloprid contaminated termites are able to return to the colony before dying, they also expose their nestmates to imidacloprid through the grooming process as their nestmates clean each other's exteriors. In this manner, the effects of imidacloprid can cascade through a termite colony as it is passed from one termite to the next during the grooming process. We call this the Prothor Viral Effect. And because it's not detectable, no termites can avoid the Prothor Viral Effect.

Prothor is great for termites. But it's also great against perimeter invading ants!

Prothor puts the proven power of imidacloprid to work for you against a wide range of perimeter invading ants. Prothor can be used at almost all points on your customer's property where ants nest, congregate and forage. Prothor puts the proven power of imidacloprid to work for you against a wide range of perimeter invading ants.

Proven in University Testing

Imidacloprid's power against perimeter invading ants has been shown in University testing. Testing at Purdue University in 2004* showed the power of imidacloprid to stop perimeter invading ants in their tracks. Imidacloprid applied as a perimeter band according to the label directions of a competing imidacloprid containing product stopped perimeter invading ants cold for at least 30 days. Compare that to the active ingredient cyfluthrin which gave significant control of ants for only two weeks in side by side testing.

Ant Control Advantages of Prothor

Prothor containing imidacloprid has several advantages in use compared to other products intended to control perimeter invading ants.

Liberal Structure Exterior Application Directions

Some perimeter ant treatment products can only be applied preventatively in a narrow strip along the perimeter of the structure at ground level. However, Prothor can be applied as a general surface treatment to structure exteriors to control ants. Prothor can also be applied to structural cracks, crevices and voids. If ants are outside, in almost every case you can treat them with Prothor where they are on the structure.

Frequent Reapplication

Some perimeter ant products face severe limitations on their treatment frequency. However, Prothor can be reapplied for ants as often as every 30 days. And unlike some products, there is no limitation on the number of times it can be applied per year.

Sidewalk to Siding

Prothor can be used almost anywhere in a customer's yard. Us it on ornamentals, turf, trees, etc. to indirectly control ants by eradicating ant food surfaces. If ants are there, you can treat them with Prothor.

Tank Mixing

Prothor in suspension concentrate form can be tank mixed with other insecticides to create a one-two punch against ants. Always read and follow label directions.

Prothor SC2 for Turf and Ornamentals

Prothor SC2 is also labeled for control of a wide range of turf and ornamental pests.

*Study published in the April 2004 issue of the Journal of Economic Entomology.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

October 26, 2010

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (83923-4)
Response to EPA Letter Dated October 5, 2010

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. (Ensystex) please find the enclosed revision to the labeling of Prothor SC 2 (EPA Reg. No. 83923-4). This is in response to the EPA's letter dated October 5, 2010 requiring that the pest, Emerald Ash Borer be removed from "the labeling and all other media used in connection with the marketing of [Prothor SC 2]".

In support of this revision, we submit the following documents:

1. Application for Amendment (EPA Form 8570-1)
2. Three (3) copies of the revised drafted labeling
3. Certification With Respect to Label Integrity
4. One (1) copy of the revised draft label on CD

Please contact me if you have any questions or need any additional information.

Sincerely,

Ross Gilbert

Enclosures

cc: D. Nimocks; Ensystex IV, Inc.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [ ] Amendment
- [x] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83923-4	V. Eagle	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 2	1	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [x] Resubmission in response to Agency letter dated 10/5/2010
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Revision to the labeling of Prothor SC 2 (EPA Reg. No. 83923-4) in response to the EPA's letter dated October 5, 2010 requiring that the pest Emerald Ash Borer be removed from the labeling.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify)
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [x] Container	2.15 gallon	[x] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [x] Lithograph Paper glued Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Ross Gilbert	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
Mgilbert	Agent
4. Typed Name	**5. Date**
Ross Gilbert	10/26/2010

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

CERTIFIED MAIL

Ensystex III, Inc.
c/o Michael Kellogg
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

OCT 0 5 2010

Dear Mr. Kellogg:

Subject: Response to Submission of Emerald Ash Borer Efficacy Data
Prother SC 2
EPA Registration No. 83923-4
Submission Date: July 19, 2010

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is not acceptable. Upon review of the registration record, it has been determined that the Emerald Ash Borer pest/claim is not supported by the data that has been submitted in connection with the product's registration. Therefore within the **Ornamental Pests Controlled by Soil Injection or Drench Application** section of the label, delete "*Emerald ash borer*" as well as from all labeling and all other media used in connection with the marketing of the product. See the enclosed efficacy review dated 8/5/10 for further specifics.

Please submit copies (3) copies of revised draft labeling, incorporating the change indicated above within 30 days. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA Section 6(e). If you have any questions regarding this label, please contact Jennifer Urbanski at (703) 347-0156 or urbanski.jennifer@epa.gov.

Regards,

Venus Eagle

Venus Eagle
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Please read instructions on reverse before complet[illegible]form. Form Approved. [illegible] No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [ ] Amendment
- [x] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number: 83923-4

2. EPA Product Manager: V. Eagle

3. Proposed Classification: [x] None [ ] Restricted

4. Company/Product (Name): Ensystex IV, Inc. / Prothor SC 2

PM#: 1

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
[ ] *Check if this is a new address*

6. **Expedited Reveiw.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [x] Resubmission in response to Agency letter dated April 20, 2010
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of efficacy data in response to the Agency letter dated April 20, 2010. As the data being submitted was requested by the Agency, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify)
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Locetion of Net Contants Information: [x] Label [x] Container

4. Size(s) Retail Container: 2.15 gallon

5. Location of Label Directions: [x] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product: [x] Lithograph Paper glued Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Ross Gilbert	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingllly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	4. Typed Name	5. Date
[signature]	Agent	Ross Gilbert	7/19/10

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 22, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 19-JUL-10. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

481576-00

July 19, 2010

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (83923-4)
Response to Agency Letter dated April 20, 2010 – Submission of Efficacy Data

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. (Ensystex) and pursuant to the Agency letter dated April 20, 2010, please find the enclosed compilation and summary of efficacy studies to retain Emerald Ash Borer on the Prothor SC 2 label.

In support of this submission, please find the enclosed:

1. Completed Application for Registration (EPA Form 8570-1)
2. Efficacy Data (3 copies):
3.

48157601	Volume 1	810.3000	Gilbert, R., Compilation and Summary of Imidacloprid Efficacy Data for Emerald Ash Borer.

As the data being submitted is a the request of the Agency, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Ross Gilbert

Enclosures

cc: D. Nimocks; Ensystex IV, Inc.

EFFICACY REVIEW

PRODUCT:	Prothor SC 2
REG NUMBER:	83923-4
DATE:	8/5/2010
GLP:	N/A
BARCODE:	380804
DECISION:	437828
CHEMICAL:	Imidacloprid (21.4%)
CHEMICAL NUMBER:	129099
PURPOSE:	Review data to support the inclusion of the emerald ash borer on label
MRIDS:	48157601. Gilbert, R. (2010). Compilation and Summary of Imidacloprid Efficacy Data for Emerald Ash Borer. Project Number: EN/201002. Unpublished study prepared by Ensystex IV, Inc. 49 p.
TEAM REVIEWER:	Jennifer Urbanski, Entomologist
EFFICACY REVIEWER:	Jennifer Urbanski, Entomologist 8/5/10
SECONDARY EFFICACY REVIEWER:	Kable Bo Davis, Entomologist 8-5-10

BACKGROUND:

Prothor SC 2 is intended for the control of various insect pests, including termites, carpenter ants, and emerald ash borers. The directions for use for emerald ash borers are limited to soil injection and soil drench treatments. Application amounts vary based on size of tree (3-6 mL per inch of trunk diameter) or shrub (3-6 mL per foot of shrub height). An example of a claim is that the emerald ash borer is an "*Ornamental Pest Controlled by Soil Injection or Drench Application*".

DATA REVIEW:

The following data review is comprised of explanations of materials and methods, and a summation of experimental results containing tables with reformatted data.

Attachment 1

The efficacy of imidacloprid pesticides for controlling emerald ash borers was reviewed and determined to be inconsistent. Sample sizes, application rates and statistics were not given for the following relevant imidacloprid studies.

Study 1

Low-soil injections were applied to two sites, one with small trees (DBH averaging 4 inches) and one with large trees (13 inch DBH). As application at the small tree site yielded positive results while application at the large tree site yielded poor results, the authors suggested that the disprepancy in efficacy may be due to insufficient imidacloprid levels or higher pest pressure on the large tree site. In the same trials, high pressure soil injections resulted in a high level of control at one site; however, similar injections applied at a different site with the same tree size and infestation parameters were entirely ineffective.

Study 2

Imidacloprid soil drenches have yielded results ranging from mixed to excellent. Research indicates that these soil drenches work best for smaller trees and control on trees larger than 15 inches is inconsistent. This inconsistency is likely due to recommended application rates, as the rate is typically dictated by DBH, even though as tree diameter increases, the amount of biomass that must be protected by the pesticide exponentially increases.

Study 3

Xytect™, an imidacloprid used in soil drenches, is effective on larger trees (15-22 inches DBH) when applied at twice its original rate. This increased application rate is now on its label. Merit® is not registered for this higher application rate, so it is recommended that it be applied twice a season, at least four weeks apart. Bayer Advanced ™ Tree and Scrub Insect Control, a homeowner formulation, may not be applied more than once, and therefore it is recommended that trees with larger than 15 inches DBH should be professionally treated.

Attachment 2

Part 1

Bare-root green ash whips were planted in 1-gallon pots in a greenhouse and were treated with a soil drench of Bayer Advanced ™ in two trials. Trial 1 consisted of seven replicates for each of 6 different application rates ranging from 0.8 to 2500 mg of imidacloprid, while trial 2 consisted of 11 replicates for each of 8 different application rates ranging from 6.25 to 800 mg of imidacloprid. Two leaves were subsequently collected from each whip and were placed into a petri dish with three adult emerald ash borers. Survival was calculated after four days of exposure and ELISA analysis was performed on the leaves.

Results

Table 1. Leaf residue analysis

Trial	Mean leaf residue range	Residues at which no feeding occurred	Residues at which 100% mortality occurred
1	0.75 – 141 ppm	> 3.5 ppm	> 33 ppm

2	0.03 – 25 ppm	> 3.8 ppm	> 40 ppm

A linear relationship was detected between log(treatment dose) and log(imidacloprid residue), with mean residues ranging from 0.75 ppm to 141 ppm in trial 1 and 0.03 ppm in trial 2. No feeding occurred at residues greater than 3.5 ppm (trial 1) and 3.8 ppm (trial 2), while 100% mortality occurred at residues greater than 33 ppm (trial 1) and 40 ppm (trial 2) (Table 1).

Part 2

Adult emerald ash borers exposed to 25 ppm of imidacloprid (a sublethal treatment in trial 2) were removed from exposed leaves and relocated to petri dishes with clean leaves. Forty-eight hours after removal, recovery was measured.

Results

Two days after removal from exposed leaves, half of the beetles originally unable to walk or feed (number of beetles not given) had recovered.

Part 3

In order to compare greenhouse results to the field, peak follicular imidacloprid residues were calculated for trees at three different sites after being exposed to a soil injection of Macho® 2F (number of trees and application rates not given).

Results

Table 2. Field follicular residues

Site	Maximum field follicular residues (ppm)	Mean field follicular residues (ppm)
7L	6.5	2.1
7s	14.4	5.2
LA	7.3	3.3

Mean leaf residues at the three sites ranged from 2.1 ppm to 5.2 ppm, while maximum leaf residues ranged from 6.3 ppm to 14.4 ppm (Table 2).

Attachment 3

Efficacy data is presented for the Asian longhorned beetle and is therefore not relevant to the emerald ash borer.

Attachment 4

At least six trees (2-22 inches in diameter) for each of eight sites were treated with soil-injected imidacloprid (Merit 75 WP; no application rate given) through either a Kiortiz injector or as a high-pressure soil injection. Untreated controls were included for each site. Xylem sap from shoots in the trees at one site was sampled roughly every two weeks for approximately two months after injection. For each tree in each site, a leaf was sampled and five emerald ash borer adults were housed with the leaf for eight days, during which survival and leaf consumption was monitored. Finally, approximately four months after treatment, at least 14 bark windows were sampled from the upper and lower canopies of all trees in order to quantify larval densities.

Results

The highest imidacloprid concentrations were found in trees exposed to high-pressure soil injections, although between-tree variability was high. For the adult efficacy experiment, less than 50% of adults had died after 5 days of exposure to a leaf from an exposed tree (no control tree data), and the beetles on leaves from the treated trees consumed less than half as much foliage as those on leaves from control trees. At the time the study was published, larval density had been collected for only a single site. Preliminary data show that larval density for the control trees was 45 larvae/m^2 of phloem, while high-pressure soil injected trees had a larval density of <10 larvae/m^2 of phloem.

Attachment 5

This attachment referred to a previous study that included data for imidacloprid soil injections and stated that effectiveness of the insecticides varied based on tree size, site conditions, and prior emerald ash borer damage. However, no experimental information or actual data was given. While the attachment includes detailed information on experiments using tree-injected imidacloprid, this is not relevant for Prothor SC 2, which is soil-injected.

Attachment 6

Ten trees (7-24 inches DBH; mean of 14 inches DBH) were exposed to a Merit soil drench (75% imidacloprid) at an application rate of 1.42g a.i./inch of DBH mixed in 1.5 gallons of water. Three branches from each tree were sampled from the upper canopy approximately 3-6 months after application, and emerald ash borer galleries and larvae were counted.

Results

The density of new emerald ash borer galleries in Merit soil drench treated trees was not significantly different from control trees. Data for larval density yielded the same results. This is not consistent with results from previous studies performed at two other sites. One of these sites contained small trees (3-4 inches DBH), in which two years of soil drench application resulted in 100% control of emerald ash borer larvae. The second site contained trees of all sizes and resulted in 40% larval control. Results from 2003 trials show that imidacloprid soil injections resulted in 0-80% larval control, depending on the site. The authors conclude that Merit soil drench provides good control in small trees (3-4 inches DBH) but inconsistent control in larger trees (> 12 inches DBH) with the first year of treatment. However, they believe that the inconsistency in larger trees may be less of an issue after 2-3 years of treatment since imidacloprid persists in the soil and trees after a year. They are awaiting data from the second and third years of treatment at the two sites yielding low control.

RECOMMENDATIONS:

In review of the submitted data and corresponding label (Prother SC 2; EPA Reg. No. 83923-4), the following recommendations apply:

1. Due to the inconsistencies found within the results of the various referenced trials and lack of specificity of several experimental designs, the submitted data are not adequate to retain claims for the control of the emerald ash borer. Additional adequate and consistent data from multiple sites must be submitted showing that

Prother SC 2 is efficacious when applied to the soil. Ideally, the following data will be submitted from each site:

a. Larval density
b. Adult mortality
c. Canopy dieback

2. Within the **Ornamental Pests Controlled by Soil Injection or Drench Application** section of the label, delete "*Emerald ash borer*".

Material to be added to an e-Jacket/Jacket

Reg. No. 83923-4

Description: _____

_____

1. ☐ **Placement within the e-Jacket/jacket:**
   - ☑ **Default: (chronological, top = newest)**
   - ☐ **File Location: (PDF page number, i.e., "before page 45")**

   _____

   _____

2. ☐ **Send to Data Extraction contractors this material:**
   - ☑ **Newly stamped accepted label**
   - ☐ **Notification**
   - ☐ **New CSF**
   - ☐ **Other:** _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Autumn Metzger

Phone: 305-5314 **Division:** IRB

Date: 4/20/10

Created March 17, 2009

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

APR 20 2010

Ensystex III, Inc.
c/o Michael Kellogg
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Dear Mr. Kellogg:

Subject: Fast Track Amendment of label to revise hole drilling language
Prothor SC 2
EPA Registration No. 83923-4
Your Submissions Dated 1-25-10

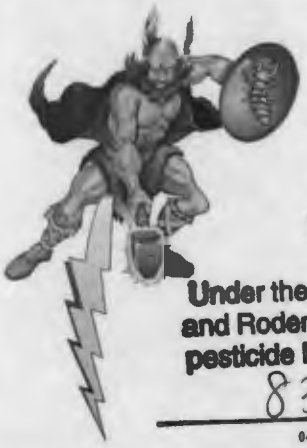
The labeling referred to above submitted in connection with the Federal Insecticide, Fungicide and Rodenticide Act, as amended is acceptable provided you make the following changes:

1. On page 7, in the table titled "Foam Mixing and Expansion Table," revise the footnote to read "* Add the foaming agent manufacturer's specified amount of foaming agent..."
2. On page 8, under "Application for Turf Pests," add the word "Restriction" in front of the sentence that reads "Prothor SC 2 is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research."
3. As listed on page 10, under the "Ornamental Pests Controlled by Soil Injection or Drench Application" section, the pest "Emerald Ash Borer" is considered a quarantine pest by the USDA and now requires efficacy data to retain this pest on labels. Submit or cite data to the Agency within 90 days from the date of this letter to retain the pest on your label or remove it from your label.

A stamped copy of the label is enclosed for your records. Please submit one final printed copy of the labeling before releasing the product for shipment. If you have any questions regarding this label, please contact Autumn Metzger at (703) 305-5314 or metzger.autumn@epa.gov.

Sincerely,

Venus Eagle for
Product Manager 01
Insecticide-Rodenticide Branch
Registration Division (7505P)



ACCEPTED
With COMMENTS
In EPA Letter Dated:
APR 20 2010
Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:
83923-4

04/10

PROTHOR SC 2

For use only by individuals/firms licensed or registered by the state to apply termiticide, turf maintenance and/or landscaping/ornamental products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	**By Wt.**
Imidacloprid	21.4%
Other Ingredients:	78.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-4 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:
ENSYSTEX IV, Inc.
Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment for Termite Control Uses: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and water-proof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Personal Protective Equipment for non-Termite Control Uses: Applicators and other handlers must wear a long-

sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

Apply this product only as specified on this label.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician must be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes.* The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table

level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for specified distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 2* or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC 2*. Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

PROTHOR SC 2 may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2		
Solution Percentage Concentration Desired	**Gallons of Finished Solution Desired**	**Fluid Ounces of PROTHOR SC 2 to add**
0.05%	1	0.28
	2	0.55
	5	1.38
	25	6.90
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
	1000	275.0 (2 gallons + 19 ounces)
0.10%	1	0.55
	2	1.10
	5	2.75
	25	13.8
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = A x 0.275

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = A x 0.55

Proportional Injector Mixing Table For PROTHOR SC 2	
Solution Percentage Concentration Desired	**Injector Volume (fluid ounces per gallon)**
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes must not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes msut not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical

conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to not puncture these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case is a structure to be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes must be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes must be spaced so as to achieve a continuous chemical barrier. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl

spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) must not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

When drilling veneer walls, care must be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Restriction: Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment specifications listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is

equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

6.90 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 13.80 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 2 to Add to Water	Expansion Ratios
25	1.0	6.90 ounces	25:1
25	2.5	6.90 ounces	10:1
25	5.0	6.90 ounces	5:1
50	1.0	13.80 ounces	50:1
50	2.5	13.80 ounces	20:1
50	5.0	13.80 ounces	10:1

*Add the foaming agent manufacturer's recommended amount of foaming agent to solution after water and PROTHOR SC 2 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 2 before mixing or using with PROTHOR SC 2.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 2 (see Foam Mixing Instructions) may be converted into a predetermined amount of foam according to the foaming agent and foaming equipment manufacturer's specifications. Verify that the foaming agent is compatible with PROTHOR SC 2.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the specified volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 2 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the specified rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however do not allow excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Restrictions: Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Restrictions: Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

APPLICATION FOR TURF PESTS

PROTHOR SC 2 controls or suppresses a wide range of soil inhabiting turfgrass insect pests. PROTHOR SC 2 is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research. Do not apply to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

Application Sites

Permitted sites include lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in PROTHOR SC 2, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Irrigate if rainfall does not occur within 24 hours. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Restrictions

Keep children and pets off treated areas until spray has dried.

Application Preparations

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount PROTHOR SC 2 mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply PROTHOR SC 2 solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply PROTHOR SC 2.

Turf Application Use Rates

Use Rate Table for PROTHOR SC 2 for Turf Applications	
Use	**Amount of PROTHOR SC 2 per 1,000**

Rate	sq. feet
A	1.25 to 1.6 pt per acre or 0.46 to 0.6 fl oz (14 to 17 ml) per 1000 sq. ft..
B	1.6 pt per acre or 0.6 fl oz (17 ml) per 1000 sq. ft.

Turf Application Volumes

The calculated amount of PROTHOR SC 2 can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass ataenius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Applications Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with PROTHOR SC 2 if adults or large nymphs are present and tunneling at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **Restriction:** PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Restriction: Do not apply through any irrigation system.

Foliar Application

Foliar application of PROTHOR SC 2 offers local systemic activity against insect pests. The use of a spreader/sticker may help applications to plants with hard to wet foliage such as holly, pine or ivy.

Ornamental Application to Control Ants

PROTHOR SC 2 can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of PROTHOR SC 2 (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for PROTHOR SC 2 for Foliar Applications
1.5 fl oz (45 ml) per 100 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for PROTHOR SC 2 for Broadcast Applications
0.46 to 0.6 fl oz (14 to 17 ml) per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2

gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. **Restriction:** PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around the perimeter of residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks. public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Test any tank mixture that has not been tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Do not allow runoff or puddling of irrigation water following application. Do not apply to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Injection for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Drench for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Restriction: Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Injection for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Drench for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

RESTRICTIONS

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not apply to soil in areas where edible plants may be planted.
- Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

Revised 04/10

RE: amendments for 83923-4 &82957-2

Mike Kellogg to Autumn Metzger

resubmission 587784

04/06/2010 05:33 PM

History: This message has been replied to.

View: (Mail Threads)

Autumn,

Labels attached with your comments incorporated. I was able to follow your comments but then I use the comment functions quite a bit when working with label vendors. I prefer the little note bubbles over the text insert function (sometimes the little blue carrot where the text is to be inserted (or replaced) is difficult to see). However if you use the "View comments" function in Adobe you can see all the comments that have been made on the document. I really like the way you did the comments on the Prothor SC 2 label, very easy to understand and follow (the one where you highlighted the affected text and added a note).

In regard to your Emerald Ash Borer comment, will it be specified in the amendment letter that Ensystex has 90 days to submit or cite efficacy data or the pest must be removed from the label?

Regards,
Mike Kellogg
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
T: 253-853-7369
F: 253-853-5516

-----Original Message-----
From: Metzger.Autumn@epamail.epa.gov [mailto:Metzger.Autumn@epamail.epa.gov]
Sent: Tuesday, April 06, 2010 10:16 AM
To: Mike Kellogg
Subject: RE: amendments for 83923-4 &82957-2

Hi Mike,

thanks for the revised labels, much easier to read!

ok you are my guinea pig...I am attaching both labels marked up with my comments. I have used a variety of ways to mark them up. Let me know if you are able to follow the comments (and which types of comments seem to be easiest to follow and understand). We can go over via phone if you want but I wanted to see if this would stream-line the process at all.

Let me know if you have any questions or issues with my comments. (And FYI - we JUST updated 432-1332 last week, not even on PPLS yet so these changes are what was also made to theirs).
thanks!

(See attached file: 082957-00002.20100403.Prothor WP label imidacloprid 75% termiticide. WITH AGENCY COMMENTS 4-6-10.pdf)(See attached file: 083923-00004.20100403.Prothor SC 2 limidacloprid 21.4% termiticide. WITH AGENCY COMMENTS 4-6-10.pdf)

Autumn Metzger
Biologist
U.S. Environmental Protection Agency
Insecticide-Rodenticide Branch
Registration Division (7505P)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Tel: 703 305-5314
Fax: 703 308-5433
Email: metzger.autumn@epa.gov

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| From: |
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|Mike Kellogg <Mike@PyxisRC.com>
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| To: |
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|Autumn Metzger/DC/USEPA/US@EPA
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| Date: |
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|04/03/2010 01:32 PM
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| Subject: |
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|RE: amendments for 83923-4 &82957-2
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Autumn,

Please find reformatted labels per your request.

Regards,
Mike Kellogg
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
T: 253-853-7369
F: 253-853-5516

From: Metzger.Autumn@epamail.epa.gov [
mailto:Metzger.Autumn@epamail.epa.gov]
Sent: Friday, April 02, 2010 7:23 AM
To: Mike Kellogg
Subject: amendments for 83923-4 &82957-2

Hi Mike,

Please resend me (electronically) new labels for each of these products in a readable font size. (minimum 10 point font)

Also, note that all marketed product labels must be in no smaller than 6 point font.
Autumn Metzger
Biologist
U.S. Environmental Protection Agency
Insecticide-Rodenticide Branch
Registration Division (7505P)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Tel: 703 305-5314
Fax: 703 308-5433
Email: metzger.autumn@epa.gov[attachment "083923-00004.20100403.Prothor SC 2 label amendment.pdf" deleted by Autumn Metzger/DC/USEPA/US] [attachment "082957-00002.20100403.Prothor WP label amendment.pdf" deleted by Autumn Metzger/DC/USEPA/US]

082957-00002.20100406.Prothor WP label amendment with EPA 20100406 changes incorporated.pdf

083823-00004.20100406.Prothor SC 2 label amendment with EPA 20100406 changes incorporated.pdf

FRB / PM 1

FAST-TRACK AMENDMENTS–Completeness Screening Checklist

Experts In-Processing Signature: M. WALSH

EPA Reg. Number: 83923-4	EPA Receipt Date: 1/26/10

	Check List Item	Yes	No	NA
1	**Application Form** (EPA Form 8570-1) –signed?	X		
2	**Confidential Statement of Formula** (EPA Form 8570-29) – signed?			X
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) signed?			X
4	**Formulator's Exemption Statement** (EPA Form 8570-27) - signed?	X		
5	**Data Matrix** (EPA Form 8570-35) [Applicable, for adding me-too uses]			X
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	**Is Label Included? (5 copies)**	X		
	Comments: LABEL AMENDMENT.			

Reviewer

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 27, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: PROTHOR SC 2
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-4
EPA RECEIPT DATE: 01/26/10

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

P. K. Moore
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service {866160Ê~

This package includes the following

- ○ New Registration
- ◉ Amendment

□ Studies? □ Fee Waiver?

□ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 1

Receipt No. S- 866160

EPA File Symbol/Reg. No. 83923-4

Pin-Punch Date: 1/26/2010

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: $ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use ☒ Uncleared Inert in Product

Reviewer: [signature] Date: 1/27/10

Remarks:

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] **Registration**
- [x] **Amendment**
- [ ] **Other**

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83923-4	V. Eagle	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 2	1	

5. Name and Address of Applicant *(Include ZIP Code)*

Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. 432-1331

Product Name Premise 2 Insecticide

Section - II

- [x] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of label amendment revising certain directions for use and updating the container disposal language. As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [x] Container	2.15 gallon	[x] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [x] Lithograph Peper glued Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature	3. Title	6. Date Application Received (Stamped)
Michael Kellogg	Agent	
4. Typed Name	**5. Date**	
Michael Kellogg	1/25/2010	

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

January 25, 2010

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (83923-4)
Submission of Label Amendment

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. (Ensystex) please find the enclosed amendment to the labeling of Prothor SC 2 (EPA Reg. No. 83923-4). Ensystex is proposing to remove the language "but in no case farther apart than 12 inches" from the sentence "Drill holes should be spaced so as to achieve a continuous chemical barrier but in no case farther apart than 12 inches" under the label heading "Vertical Barriers Along Interior of Foundation Walls". Similar language can be found on the substantially similar product label, Premise 2 Insecticide (EPA Reg. No. 432-1331). A copy of the EPA approved labeling for Premise 2 is enclosed with the language highlighted for your convenience.

Additional language has also been added to the Container Disposal section of the Storage and Disposal instructions per EPA's Label Review Manual.

In support of this amendment application, we submit the following documents:

1. Application for Amendment (EPA Form 8570-1)
2. One (1) copy of the proposed Prothor SC 2 labeling with changes tracked
3. Five (5) copies of the proposed Prothor SC 2 labeling with changes incorporated
4. Certification With Respect to Label Integrity
5. One (1) copy of the proposed Prothor SC 2 label on CD
6. Formulators Exemption Statement (EPA Form 8570-27)
7. One (1) copy of the Premise 2 label with similar language highlighted

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

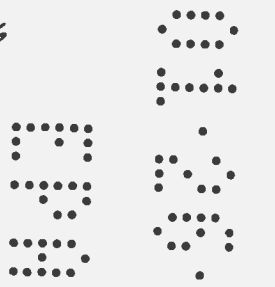
Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures

cc: D. Nimocks; Ensystex IV, Inc.



Form approved. OMB No. 2070-0060, 2070-0057, 2070-0107, 2070-0122, 2070-0164.

EPA

United States
Environmental Protection Agency
Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address	EPA File Symbol/Registration Number
Ensystex IV, Inc. 2713 Breezewood Avenue Fayetteville, NC 28303	83293-4
	Product Name Prothor SC 2
	Date of Confidential Statement of Formula *(EPA Form 8570-4)* 08/20/2009

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Imidacloprid

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☐ (A) An accurate Confidential Statement of Formula *(EPA FORM 8570-4)* for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☑ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Imidacloprid	[redacted]	[redacted]

Signature	Name and Title	Date
[signature]	Michael Kellogg / Agent	11/25/20[illegible]

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 – EPA
Copy 2 - Applicant copy

Product ingredient source information may be entitled to confidential treatment

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL

EPA Registration #	Date Submitted to EPA	Electronic file name
83923-4	January 25, 2010	083923-00004.20100125.Prothor SC 2 label amendment.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature

1/25/2010
Date

Michael Kellogg

Name (typed)

Agent

Title

17 A 1-2

Print Form

Please Read All Instructions Before Completing this Form *(Form must be typed)* Form Approved. OMB No. 2070-0044. Approval Expires 1-31-96

United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product	Distributor Company Number
83923-4	86052

Note: Do not submit distributor product labels

Name of Registered Product *(basic product name accepted by EPA)*	Distributor Product Name
Prothor SC2	Pestrong Power SC

Name and Address of Distributor *(Type; include ZIP code)*

KORUSA
3065 Buford hwy. Suite D
Duluth, GA, 30096

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...","distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor: owner

Date: 12-08-2009

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant: U.P. Tech Services

Date: 1/8/10

EPA Form 8570-5 (Rev. 8-94) Previous editions are obsolete. White - EPA

Material to be added to an e-Jacket/Jacket

Reg. No. 839234

Description: _____

_____

1. ☐ **Placement within the e-Jacket/jacket:**
   - ☐ **Default: (chronological, top = newest)**
   - ☐ **File Location: (PDF page number, i.e., "before page 45")**

     _____

     _____

2. ☐ **Send to Data Extraction contractors this material:**
   - ☐ **Newly stamped accepted label**
   - ☐ **Notification**
   - ☒ ~~New~~ **CSF** (rejected)
   - ☐ **Other:** _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Dan Daniel

Phone: 703 305-5409 **Division:** RD

Date: 11/24/09

Created August 19, 2008

November 24, 2009

Letter to the file:

EPA Registration Numbers

83923-1
83923-2
83923-3
83923-4
83923-5

Dani Daniel of the IRB branch contacted Ensystex IV, Inc. (Pyxis Regulatory Consulting, Inc.) representative; Michael Kellogg, advising him that the above mention csfs are deficient due to unapproved inerts and therefore, are not acceptable in accordance to the EPA guidelines. A copy of the Inert Clearance Status Form which lists all deficiencies has been sent to Mr. Kellogg with instructions to correct the alternate confidential statement of formulation and resubmit.

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [x] Amendment
- [ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83923-4	V. Eagle	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 2	1	

5. Name and Address of Applicant *(Include ZIP Code)*

Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

- [x] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency latter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of an amendment to the Confidential Statement of Formula (Basic Formulation). As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* ***Certification must be submitted***	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [x] Container	2.15 gallon	[x] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [x] Lithograph Paper glued Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingllly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature	3. Title	6. Date Application Received (Stamped)
Michael Kellogg	Agent	
4. Typed Name	**5. Date**	
Michael Kellogg	10/22/09	

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

INERT CLEARANCE STATUS FORM

Reviewer Name: Sandra Rock			Request date: 11/02/2009
Tel: 703-308-6164	RD/IIAB	CUBE: S-7982	MAIL CODE: 7505P

A. COMMENTS:

B. PESTICIDE PRODUCT INFORMATION:

Receipt Number: S-861144 EPA Reg. No/File Symbol: 83923-4 Product Name: Prothor SC 2	Date on CSF: 10/22/2009 Formulation: Basic	Food-Use Pesticide: [] Yes [x]No

C. INGREDIENT INFORMATION:

Ingredient No.1

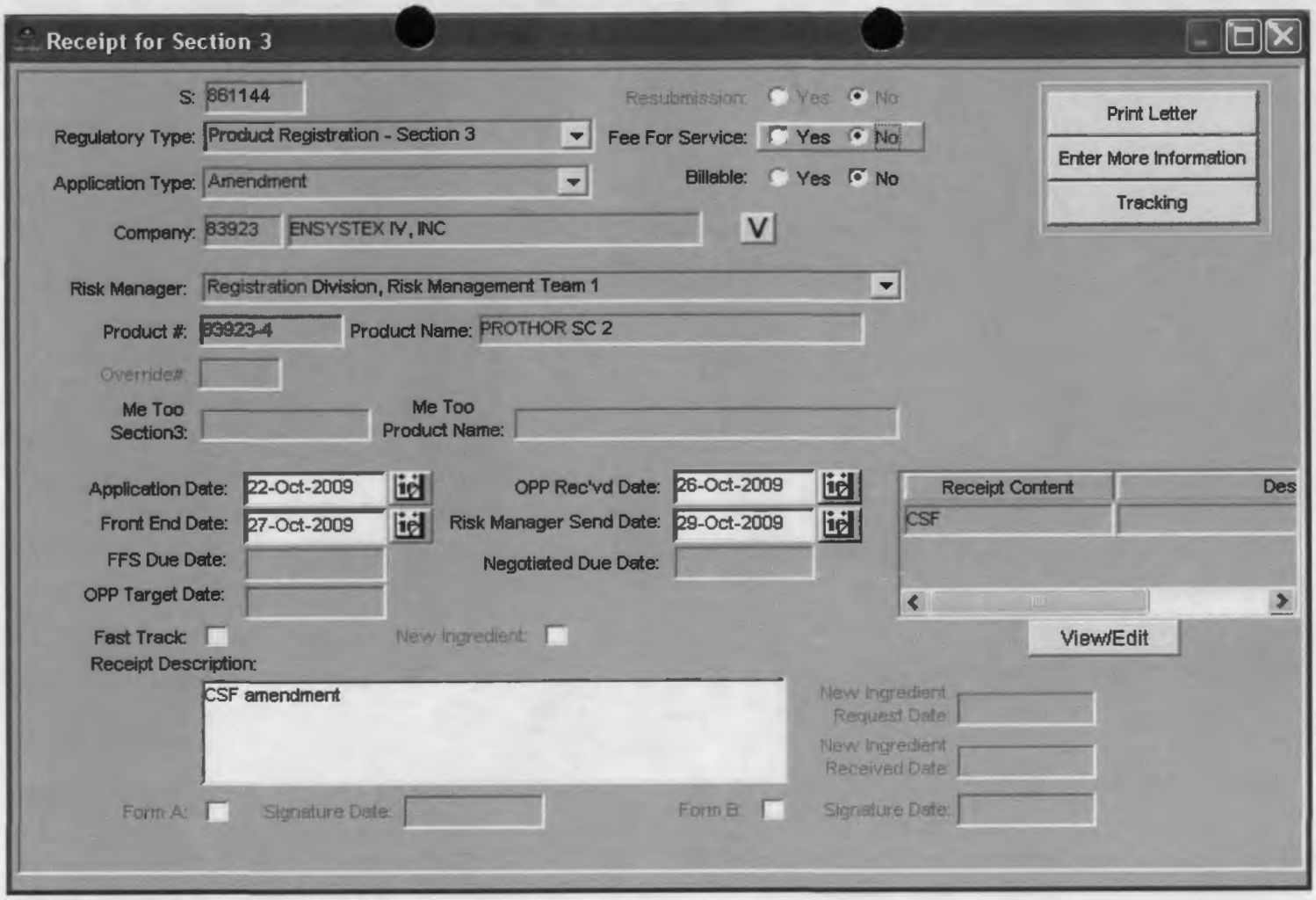
	Tolerance Exemption(s)[1] 910	920	930	940	950	960
Chem. Name						
Trade Name [redacted]						
CAS Reg. No.:						
Comments: This trade product is not sufficiently identified by the MSDS provided. Please provide full compositional information including the manufacturer, trade name, constituent names, CAS numbers, and weight/weight percent composition (**100% full composition**).						

Ingredient No. 2

Chem. Name:						
Trade Name:						
CAS Reg. No.:						
Comments:						

Reviewer Name: Sandra Rock **Review Date: 11/02/2009**

[1] *Language from the Code of Federal Regulations (40 CFR 180, subpart D):*
40 CFR 180.910: Inert ingredients used pre- and post-harvest; 40 CFR 180.920: Inert ingredients used pre-harvest; 40 CFR 180.930: Inert ingredients applied to animals; 40 CFR 180.940: Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations; 40 CFR 180.950: Tolerance exemptions for minimal risk active and inert ingredients; and 40 CFR 180.960: Polymers.



PM1

Dawn

I need to not approved

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 29, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: PROTHOR SC 2
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-4
EPA RECEIPT DATE: 10/26/09

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

P. L. Moore
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

pm
{861144É~

This package includes the following

- ○ New Registration
- ◉ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 1

Receipt No.	S-	861144
EPA File Symbol/Reg. No.		83923-4
Pin-Punch Date:		10/26/2009

☑ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: $ ________

Parent/Child Decisions:

Inerts not approved. See status form
S. Roe 11/2/09

▣ Inert Cleared for Intended Use ▣ Uncleared Inert in Product

Reviewer: ________ Date: 10/28/09

Remarks:

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

October 22, 2009

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (EPA Reg. No. 83923-4)
Amendment to the Confidential Statement of Formula (CSF)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed amendment to the Prothor SC 2 (Basic formulation). Ensystex IV, Inc. is requesting to add two (2) alternate inert ingredients and an additional source of inert ingredient as identified below:

[redacted]

In support of this amendment, we submit the following documents:

1. Copy of the cover letter with Confidential Business Information redacted
2. Completed Application for Amendment (EPA Form 8570-1)
3. Two (2) copies of the Confidential Statement of Formula (Basic formulation dated October 22, 2009)
4. MSDS sheets for the inert ingredients listed above

The Basic formulation CSF submitted with this amendment application is intended to **REPLACE** any previously approved Basic CSF's for Prothor SC 2.

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to call me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures
cc: D. Nimocks; Ensystex IV, Inc.

Inert ingredient information may be entitled to confidential treatment

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONFIDENTIAL BUSINESS INFORMATION REDACTED

October 22, 2009

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (EPA Reg. No. 83923-4)
Amendment to the Confidential Statement of Formula (CSF)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed amendment to the Prothor SC 2 (Basic formulation). Ensystex IV, Inc. is requesting to add two (2) alternate inert ingredients and an additional source of inert ingredient as identified below:

[redacted]

In support of this amendment, we submit the following documents:

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4. MSDS sheets for the inert ingredients listed above

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Sincerely,

Michael Kellogg

Enclosures
cc: D. Nimocks; Ensystex IV, Inc.

Material to be added to an e-Jacket/Jacket

Reg. No. 82923-4

Description: _____

1. ☐ **Placement within the e-Jacket/jacket:**
   - ☐ **Default: (chronological, top = newest)**
   - ☐ **File Location: (PDF page number, i.e., "before page 45")**

2. ☐ **Send to Data Extraction contractors this material:**
   - ☐ **Newly stamped accepted label**
   - ☐ **Notification**
   - ☐ **New CSF**
   - ☒ **Other:** Amended Basic CSF

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Dan Daniel

Phone: 703 305-5409 **Division:** PD

Date: 09/15/09

Created August 19, 2008

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 15 2009

Mr. Michael Kellogg
Pyxis Regulatory Consulting, Inc.
4110 136th Street NW
Gig Harbor, WA 98332

Subject: The Addition of an Alternate Inert Source in the Basic CSF

Bithor SC GC	EPA Reg. No. 83923-1
Bithor SC	EPA Reg. No. 83923-2
Prothor SC 0.5	EPA Reg. No. 83923-3
Prothor SC 2	EPA Reg. No. 83923-4
Turfthor 2F	EPA Reg. No. 83923-5

Your Submission dates, August 20 & 24

Dear Mr. Kellogg:

The Agency has received and reviewed your Basic Confidential Statements of Formulation dated August 20 & 24, 2009. Your request for an additional source inert, identified as [redacted] is granted. The new confidential statement of formulation will become a part of the permanent record. If there are questions call me at 703 305-5409.

Sincerely,

/s/

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505P

Inert ingredient information may be entitled to confidential treatment

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☑ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83923-4	V. Eagle	☑ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 2	1	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

☑ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in repsonse to Agency letter dated _____
☐ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additionel page(s) if necessary. (For section I and Section II.)

Submission of an amendment to the Confidential Statement of Formula (Basic Formulation). As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☑ No	☐ Yes ☑ No	☐ Yes ☑ No	☐ Metal ☑ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____
Certification must be submitted	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☑ Label ☑ Container	2.15 gallon	☑ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☑ Lithograph / Paper glued / Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 853-7869

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature	3. Title	6. Date Application Received (Stamped)
[signature]	Agent	
4. Typed Name	**5. Date**	
Michael Kellogg	8/24/09	

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

August 20, 2009

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (EPA Reg. No. 83923-4)
Amendment to the Confidential Statement of Formula (CSF)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed amendment to the Prothor SC 2 (Basic formulation). Ensystex IV is requesting to add an additional source of inert ingredient as identified below:

[redacted]

In support of this amendment, we submit the following documents:

1. Copy of the cover letter with Confidential Business Information redacted
2. Completed Application for Amendment (EPA Form 8570-1)
3. Two (2) copies of the Confidential Statement of Formula (Basic formulation dated August 20, 2009)
4. MSDS and technical specification sheet for the inert ingredient listed above

The Basic formulation CSF submitted with this amendment application is intended to **REPLACE** any previously approved Basic CSF's for Prothor SC 2.

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to call me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures
cc: David Nimocks; Ensystex IV, Inc.

Inert ingredient information may be entitled to confidential treatment

Fee for Service

pem {856566N~

This package includes the following

- ○ New Registration
- ◉ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 1

Receipt No. S-	856566
EPA File Symbol/Reg. No.	83923-4
Pin-Punch Date:	8/25/2009

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: $ _____

Inerts approved. S. Rock 8/28/09

Parent/Child Decisions:

☒ Inert Cleared for Intended Use ☐ Uncleared Inert in Product

Reviewer: [signature] Date: 8/26/09

Remarks:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 26, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: PROTHOR SC 2
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-4
EPA RECEIPT DATE: 08/25/09

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

P. K Moore
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

IRB / PM 1 ✓

FAST-TRACK AMENDMENTS–Completeness Screening Checklist

Experts In-Processing Signature: M. WALSH

EPA Reg. Number: 83923-4	EPA Receipt Date:

	Check List Item	Yes	No	NA
1	**Application Form** (EPA Form 8570-1) –signed?	X		
2	**Confidential Statement of Formula** (EPA Form 8570-29) – signed?	X		
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) signed?			X
4	**Formulator's Exemption Statement** (EPA Form 8570-27) - signed?			X
5	**Data Matrix** (EPA Form 8570-35) [Applicable, for adding me-too uses]			X
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	**Is Label Included? (5 copies)**			X
	Comments: CSF Amendment. Insert approved'			

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Michael Kellogg
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th Street, NW
Gig Harbor, WA 98332

SEP 2 2008

Dear Mr. Kellogg:

Subject: Storage Stability and Corrosion Characteristics Studies
Prothor SC 2
EPA Registration No. 83923-4
Submission Date: October 25, 2007

The Agency has reviewed the Storage Stability (830.6317) and the Corrosion Characteristics Study (830.6320) submitted as required by the Notice of Pesticide Registration dated March 6, 2007 for the product referenced above. It has been determined that the studies are acceptable to support the registration of this product. A complete copy of the review has been included with this letter for you information. No further product chemistry information is required for this product at this time. If you have any questions regarding this letter, please contact me at 703 306-0415.

Sincerely yours,

Kable Bo Davis
Entomologist
Insecticide/Rodenticide Branch
Registration Division (7505P)

Enclosure- Review

DATE OUT:

SUBJECT: STORAGE STABILITY (830.6317) & CORROSION CHARACTERISTICS (830.6320) REVIEW
ACCELERATED STUDY []; ONE YEAR STUDY [X];
OVER 1 YEAR STUDY [ ]
MP [ ] EP [X] EUP [ ]
DP BARCODE No.: 346356 REG. No. : 83923-4
DECISION No.: 385834 MRID No(s): 472653-1
PRODUCT NAME: PROTHOR SC 2
COMPANY:ENSYSTEX IV, INC

FROM: William Herald / Reviewer
Product Chemistry Team
Technical Review Branch/RD (7505P)

TO: Venus Eagle / Kable Davis , PM Team 1
Insecitcider-Rodenticide Branch / RD (7505P)

I. CONCLUSIONS:

STORAGE STABILITY (830.6317):
[X] ACCEPTABLE
[ ] UNACCEPTABLE*
[ ] UPGRADEABLE*

40CFR158.190 DATA REQUIREMENT: [X] SATISFIED [ ] NOT SATISFIED

CORROSION CHRACTERISTICS (830.6320):
[X] ACCEPTABLE
[ ] UNACCEPTABLE*
[ ] UPGRADEABLE*

40CFR158.190 DATA REQUIREMENT: [X] SATISFIED [ ] NOT SATISFIED

* If unacceptable or upgradeable describe the deficiency and provide recommendations

Comments & Recommendations:

Sbm/01/24/07

II. STUDY SUMMARY

A. STUDY CONDUCTED UNDER US GLP/OECD GUIDELINES
[X] Yes
[ ] No

B. PRODUCT INFORMATION

Active ingredient(s): Imidacloprid
Label claim(s) Nominal concentration: Imidacloprid 21.4 %
Initial concentration(s) of the AI(s) (%) used in the study: Imidacloprid 21.42%
Lower certified limits (%) based on AI % in the study: Imidacloprid 20.777%

C. EXPERIMENTAL PARAMETERS

Temperature: 18 °C to 25 °C
Humidity: Indicate % (if provided)
Duration of study: [X] 1 year; [ ] over 1 year
Type of container: 125 ml opaque HDPE
Analysis at intervals: [X] 0 (initial);
[X] 3 months; [X] 6 months
[X] 9 months; [X] 12 months
[ ] Over 12 months

D. ANALYTICAL METHOD

Method	DETECTOR
High Pressure Liquid chromatography (HPLC)	▪ UV/VIS 235nm

E. RESULTS

E. RESULTS
The report shows that following the initial characterization of the AI:
1) After storage at 18 to 25 °C for periods of 3, 6, 9 and 12 months the AI% remained well within statutory parameters (40 CFR § 158.175).
2) There were no reported impurities during any point of the 12 month study.
3) There were no reported adverse reactions involving the product with the opaque, high-density polyethylene, 125 mL containers during any point of the 12 month study.
4) The report recites that linearity, standard accuracy, precision, and spiked recovery were performed to ensure method performance.

Regarding GLP, it is noted that the reports states that while the characterization of the reference substance was not documented according to GLP, the purity of the materials used was certified by a reputable supplier.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

472653-00

October 25, 2007

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (AMEND)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (83923-4)
Submission of Storage Stability and Corrosion Characteristic Study per the Agency letter dated March 6, 2007

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. and in response to the Agency letter dated March 6, 2007, please find the enclosed storage stability and corrosion characteristics study for Prothor SC 2 (EPA Reg. No. 83923-4).

In support of this submission, please find the enclosed:

1. Completed Application for Registration (EPA Form 8570-1)
2. Product Specific Chemistry Data (3 copies):

47265301 Volume 1 830.6317; 830.6320 Wo, C., Prothor SC 2, Storage Stability and Corrosion Characteristics.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex IV, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

June 16, 2008

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (**FNL LBL**)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (EPA Reg. No. 83923-4)
Submission of Final Product Labeling per the Agency Letter dated March 28, 2008

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed final labeling for Prothor SC 2 (EPA Reg. No. 83923-4) per the Agency letter dated March 28, 2008.

In support of this submission, enclosed please find the following documents:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. One (1) copy of the Prothor SC 2 final label

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [ ] Amendment
- [x] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83293-4	V. Eagle	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 2	01	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [x] Final printed labels in repsonse to Agency letter dated March 28, 2008
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Submission of final product label per the Agency letter dated March 28, 2008.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify)
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[ ] Label [x] Container	2.15 gallon	[x] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [x] Lithograph / Paper glued / Stenciled [ ] Other _____

Section - IV

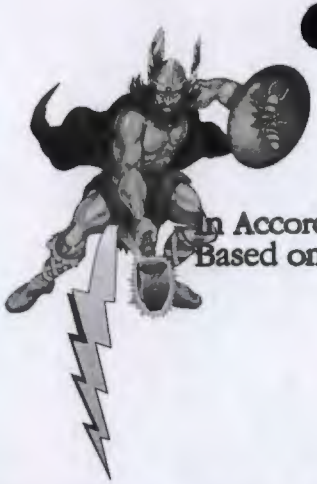
1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 853-7369

Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	
Michael Kellogg	Agent	
4. Typed Name	**5. Date**	
Michael Kellogg	6/16/08	



NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

MAR 2 8 2008

PROTHOR SC 2

For use only by individuals/firms licensed or registered by the state to apply termiticide, turf maintenance and/or landscaping/ornamental products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By Wt.
Imidacloprid	21.4%
Other Ingredients:	78.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-4 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment for Termite Control Uses: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and water-proof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Personal Protective Equipment for non-Termite Control Uses: Applicators and other handlers must wear a long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton..

Termite Control Treatment: When treating adjacent to an existing structure, the applicetor must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters..

Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may rasult in contamination of the surrounding groundwater.

Apply this product only as specified on this label.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

General

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician should be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes*. The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 2* or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC 2*. Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

PROTHOR SC 2 may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 2 to add
0.05%	1	0.28
	2	0.55
	5	1.38
	25	6.90
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
	1000	275.0 (2 gallons + 19 ounces)
0.10%	1	0.55
	2	1.10
	5	2.75
	25	13.6
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = A x 0.275

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = A x 0.55

Proportional Injector Mixing Table For PROTHOR SC 2

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rodholes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes should not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the sprey solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to avoid puncturing these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or coverad by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more then four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacant foundation and to apply solution. Holes should be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacant to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes should be spaced so as to achieve a continuous chemical barrier but in no case farther apart than 12 inches. Special cere must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacant to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearence between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminatad areas of the structure until the clean-up is completed.

Note: When drilling veneer walls, care should be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Note: Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

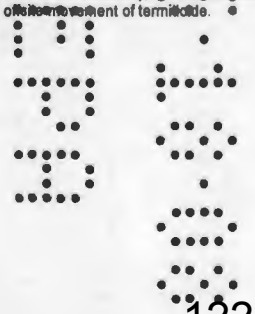
Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface dreins that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.



FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

6 90 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0 05% active ingredient 13 80 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 2 to Add to Water	Expansion Ratios
25	1.0	6.90 ounces	25:1
25	2.5	6.90 ounces	10:1
25	5.0	6.90 ounces	5:1
50	1.0	13.80 ounces	50:1
50	2.5	13.80 ounces	20:1
50	5.0	13.80 ounces	10.1

*Add the foaming agent manufacturer's recommended amount of foaming agent to solution after water and PROTHOR SC 2 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 2 before mixing or using with PROTHOR SC 2.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 2 (see Foam Mixing Instructions) may be converted into a predetermined amount foam according to the foaming agent and foaming equipment manufacturer's recommendations. Verify that the foaming agent is compatible with PROTHOR SC 2.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume (see Foam Mixing Instructions) Then add to the solution the recommended volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 2 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0 10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0 05% to 0 10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however avoid excess dripping or runoff from vertical or overhead surfaces

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

APPLICATION FOR TURF PESTS

PROTHOR SC 2 controls or suppresses a wide range of soil inhabiting turfgrass insect pests. PROTHOR SC 2 is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites include lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in PROTHOR SC 2, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Restrictions

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

Application Preparations

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to excaed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility

Application Equipment and Methods

Apply the indicated amount PROTHOR SC 2 mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply PROTHOR SC 2 solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply PROTHOR SC 2.

Turf Application Use Rates

Use Rate Table for PROTHOR SC 2 for Turf Applications	
Use Rate	**Amount of PROTHOR SC 2 per 1,000 sq. feet**
A	1.25 to 1.6 pt per acre or 0.46 to 0.6 fl oz (14 to 17 ml) per 1000 sq. ft..
B	1.6 pt per acre or 0.6 fl oz (17 ml) per 1000 sq. ft.

Turf Application Volumes

The calculated amount of PROTHOR SC 2 can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it wes mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass ataenius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with PROTHOR SC 2 if adults or large nymphs are present and tunneling at the time of application

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemetenes, airports and parks, public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Do not apply through any irrigation system.

Foliar Application

Foliar application of PROTHOR SC 2 offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants

PROTHOR SC 2 can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of PROTHOR SC 2 (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for PROTHOR SC 2 for Foliar Applications
1.5 fl oz (45 ml) per 100 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for PROTHOR SC 2 for Broadcast Applications
0.46 to 0.6 fl oz (14 to 17 ml) per 1,000 sq. ft

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks. public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Injection for Trees
0 1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D B H)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequete for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods Make a minimum of 4 injection holes per tree For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Drench for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Injection for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Drench for Shrubs
0.1 to 0 2 fl oz (3 to 6 ml) per foot of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier

RESTRICTIONS

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

Revised 02/08

Kable Davis/DC/USEPA/US
05/07/2008 10:18 AM

To "Janelle Kay" <Janelle@PyxisRC.com>
cc
bcc
Subject Labeling Error (Reg. No. 83923-4)

Janelle.....I hope all is well. I wanted to let you know that the Agency letter dated March 28, 2008 concerning the labeling amendment for Prothor SC 2 has the wrong registration number on it. The correct number is 83923-4, however I wrote 83293-4. The stamped label has the correct registration number. I will correct this error in the product file.

If you have any questions, please let me know. Sorry for the mistake.

Have a great day.
Bo

Kable Bo Davis, MS
Entomologist
U.S. Environmental Protection Agency
Insecticide-Rodenticide Branch
Registration Division (7505P)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Tel: 703 306-0415
Fax: 703 305-6596
Email: davis.kable@epa.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Janelle Kay
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. N.W.
Gig Harbor, WA 98332

MAR 2 8 2008

Dear Ms. Kay:

Subject: Labeling Amendment; Addition of Turf and Ornamental Directions for Use
Prothor SC 2 83923-4
EPA Registration No. ~~83293-4~~
Date Submitted: March 27, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

1. Within the **Application Sites** portion of the **APPLICATION TO TURFGRASS** section of the label, revise the sentence "*Permitted sites include but are not limited to lawns, grounds and ...*" to read "*Permitted sites include lawns, grounds and...*"
2. Within the **APPLICATION TO TURFGRASS** section of the label, revise the header **Application Precautions and Preparations** to read "***Application Restrictions***." In addition, immediately before the sentence "*PROTHOR SC 2 can be mixed with other insecticides...*" include the header "***Application Preparations***."
3. Within the **Application Sites** portion of the **FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS** section of the label, revise the sentence "*For use on ornamental plants including but not limited to trees (including...*" to read "*For use on ornamental plants including trees (including...*"
4. Within the **Application Sites** portion of the **SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS** section of the label, revise the sentence "*For use on ornamental plants including but not limited to trees (including...*" to read "*For use on ornamental plants including trees (including...*"
5. Revise the header **ATTENTION** to read "***RESTRICTIONS.***"

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please contact me at (703) 306-0415.

Sincerely,

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

PROTHOR SC 2

For use only by individuals/firms licensed or registered by the state to apply termiticide, turf maintenance and/or landscaping/ornamental products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By Wt.
Imidacloprid	21.4%
Other Ingredients:	78.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-4 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment for Termite Control Uses: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and water-proof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Personal Protective Equipment for non-Termite Control Uses: Applicators and other handlers must wear a long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton..

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleanad up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters..

Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

Apply this product only as specified on this label.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAR 28 2008
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 83923-4

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

General

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician should be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes.* The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that rasult in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing matarials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system prassure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percantage (%) concantration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 2* or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC 2*. Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

PROTHOR SC 2 may also ba mixed into full tenks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 2 to add
0.05%	1	0.28
	2	0.55
	5	1.38
	25	6.90
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
	1000	275.0 (2 gallons + 19 ounces)
0.10%	1	0.55
	2	1.10
	5	2.75
	25	13.8
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = A x 0.275

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = A x 0.55

Proportional Injector Mixing Table For PROTHOR SC 2

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or *as otherwise directed in this label.*

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concantration are consistent with label directed rates and a continuous barrier can still ba achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entira surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an epplication by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes should not extend below the footing. When trenching, the trench along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat tha soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 8 inches wide and 6 inches deep. Use a low-pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to avoid puncturing these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) Including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes should be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes should be spaced so as to achieve a continuous chemical barrier but in no case farther apart than 12 inches. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

Note: When drilling veneer walls, care should be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Note: Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

6.90 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 13.80 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 2 to Add to Water	Expansion Ratios
25	1.0	6.90 ounces	25:1
25	2.5	6.90 ounces	10:1
25	5.0	6.90 ounces	5:1
50	1.0	13.80 ounces	50:1
50	2.5	13.80 ounces	20:1
50	5.0	13.80 ounces	10:1

*Add the foaming agent manufacturer's recommended amount of foaming agent to solution after water and PROTHOR SC 2 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 2 before mixing or using with PROTHOR SC 2.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 2 (see Foam Mixing Instructions) may be converted into a predetermined amount foam according to the foaming agent and foaming equipment manufacturer's recommendations. Verify that the foaming agent is compatible with PROTHOR SC 2.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the recommended volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 2 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however avoid excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

APPLICATION FOR TURF PESTS

PROTHOR SC 2 controls or suppresses a wide range of soil inhabiting turfgrass insect pests. PROTHOR SC 2 is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites include but are not limited to lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in PROTHOR SC 2, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount PROTHOR SC 2 mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply PROTHOR SC 2 solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply PROTHOR SC 2.

Turf Application Use Rates

Use Rate Table for PROTHOR SC 2 for Turf Applications	
Use Rate	**Amount of PROTHOR SC 2 per 1,000 sq. feet**
A	1.25 to 1.6 pt per acre or 0.46 to 0.6 fl oz (14 to 17 ml) per 1000 sq. ft..
B	1.6 pt per acre or 0.6 fl oz (17 ml) per 1000 sq. ft.

Turf Application Volumes

The calculated amount of PROTHOR SC 2 can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass ataenius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with PROTHOR SC 2 if adults or large nymphs are present and tunneling at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants thet will not produce a harvestable egricultural commodity within the next 12 months. PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applicetions made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Do not apply through any irrigation system.

Foliar Application

Foliar application of PROTHOR SC 2 offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants

PROTHOR SC 2 can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of PROTHOR SC 2 (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for PROTHOR SC 2 for Foliar Applications
1.5 fl oz (45 ml) per 100 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for PROTHOR SC 2 for Broadcast Applications
0.46 to 0.6 fl oz (14 to 17 ml) per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

PROTHOR SC 2, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. PROTHOR SC 2 is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

PROTHOR SC 2 is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of PROTHOR SC 2 is realized when PROTHOR SC 2 is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining PROTHOR SC 2 with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pests infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks. public and private wooded and forested areas.

Application Preparation

PROTHOR SC 2 can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Injection for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot canters in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for PROTHOR SC 2 for Soil Drench for Trees
0.1 to 0.2 fl oz (3 to 6 ml) per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Injection for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for PROTHOR SC 2 for Soil Drench for Shrubs
0.1 to 0.2 fl oz (3 to 6 ml) per foot of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of PROTHOR SC 2 in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

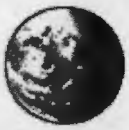
DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

Revised 02/08



"Janelle Kay"
<Janelle@PyxisRC.com>
03/27/2008 01:09 PM

To Kable Davis/DC/USEPA/US@EPA
cc
bcc
Subject Prothor SC2

History: This message has been replied to.

Bo,

As requested, attached please find a clean copy of the revised Prothor SC2 label (EPA Reg. No. 83923-4) that incorporates storage and disposal language from PRN 2007-4. Please let me know if you have any questions or additional changes.

On an unrelated note, any progress on the sulfuryl fluoride breathing zone language?

Regards,
Janelle
Janelle Kay
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
P: 253-853-7369
F: 253-853-5516
E: Janelle@PyxisRC.com

083923-00004.20080327.Prothor SC2.pdf

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

February 15, 2008

COURIER DELIVERY

Venus Eagle/Kable Davis (Team 01)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (83923-4)
Submission of Label Amendment

Dear Ms. Eagle/Mr. Davis,

On behalf of Ensystex IV, Inc. (Ensystex) please find the enclosed amendment to the labeling of Prothor SC 2 (EPA Reg. No. 83923-4). Ensystex is adding uses from its Turfthor 2F (EPA Reg. No. 83923-5) to the Prothor SC 2 label. As there are no public health uses being proposed to be added and because Ensystex qualifies for Formulator's Exemption, Ensystex believes that this submission does not require the submission of a data matrix or certification with respect to citation of data. In addition, Ensystex would like to note that another registrant, Control Solutions, has a similar label to the label proposed by Ensystex, under EPA Reg. No. 53883-229.

In support of this amendment application, we submit the following documents:

1. Application for Amendment (EPA Form 8570-1)
2. One (1) copy of the amended labeling with changes tracked
3. Five (5) copies of the amended labeling with changes incorporated
4. Formulators Exemption Statement (EPA Form 8570-27)
5. Letter of Authorization

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Janelle Kay

Enclosures

cc: David Nimocks; Ensystex IV, Inc.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

United States
Environmental Protection Agency
Washington, DC 20460

☑ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83293-4	V. Eagle	☑ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 2	01	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
☐ *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. 53883-29
Product Name IMI 2 Lb Insecticide

Section - II

☑ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in repsonse to Agency letter dated _____
☐ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of label amendment adding uses from Ensystex IV Inc.'s Turfthor 2F label (EPA Reg. No. 83923-5). As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes ☑ No	☐ Yes ☑ No	☐ Yes ☑ No	☐ Metal ☑ Plastic ☐ Glass ☐ Paper ☐ Other (Specify)
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☐ Label ☑ Container	1 pt., 1 qt., 1 gallon, 2.5 gallons	☐ On Label ☑ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☑ Lithograph Paper glued Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Janelle Kay	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	
MY	Agent	
4. Typed Name	**5. Date**	
Janelle Kay	2/15/95	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 21, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: PROTHOR SC 2
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-4
EPA RECEIPT DATE: 02/19/08

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

IRB

FAST-TRACK AMENDMENTS–Completeness Screening Checklist

Experts In-Processing Signature: [signature] PM-01

EPA Reg. Number: 83923-4	EPA Receipt Date: 2/19/08

	Check List Item	Yes	No	NA
1	**Application Form** (EPA Form 8570-1) –signed?	✓		
2	**Confidential Statement of Formula** (EPA Form 8570-29) – signed?			✓
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) signed?			✓
4	**Formulator's Exemption Statement** (EPA Form 8570-27) - signed?	✓		
5	**Data Matrix** (EPA Form 8570-35) [Applicable, for adding me-too uses]			✓
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	**Is Label Included? (5 copies)**	✓		
	Comments: Needs Data Matrix / Certification with Respect to Citation of Data			

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Janelle Kay for
Insyptex IV, Inc.
4110 136th St., N.W.
Gig Harbor, WA. 98332

Date: 2/21/2008

Your email: _____

Subject: File Symbol/Registration No. 83923-4

Dear Mr./Ms. Kay

The above referenced PRIA application was screened by the Registration Division's Completeness Check Team and determined to be deficient. Please see the enclosed copy of our screening checklist for the specific deficiency.

You must submit corrections within 7 days of the date of this notice, to the Completeness Check Team. Include the following Decision Number on your cover letter with the words **"Resubmission – For RD's Completeness Check Team"** to identify your package.

Decision #D _____
RESUBMISSION – For RD's Completeness Check Team

You may send in corrections via fax or e-mail, provided that the material is not Confidential Business Information. Our fax number is (703) 347-8932. Our e-mail address is: OPP_RD_Completenesss_Screening@epa.gov.

If you cannot meet this time frame, please contact us for further discussions on this matter. My telephone number is (703) 305-5697.

Sincerely,

Completeness Check Team
Registration Division (7505P)
U.S. EPA, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attachment

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

February 19, 2008

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (**FNL LBL**)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (EPA File Symbol No. 83923-4)
Submission of Final Product Labeling per the Agency Letter dated March 15, 2007

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed final labeling for Prothor SC 2 (EPA Reg. No. 83923-4) per the Agency letter dated March 15, 2007.

In support of this submission, enclosed please find the following documents:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. One (1) copy of the Prothor SC 2 final label

Please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060. Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [✓] Registration
- [ ] Amendment
- [ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
83293-4	V. Eagle	[✓] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 2	01	

5. Name and Address of Applicant *(Include ZIP Code)*

Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [✓] Final printed labels in repsonse to Agency letter dated March 15, 2007
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of final product label per the Agency letter dated March 15, 2007.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Metal [ ] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[ ] Label [ ] Container		[ ] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [ ] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 853-7369

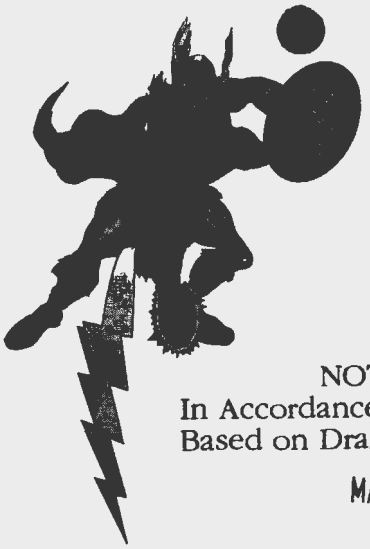
Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	5. Date
Michael Kellogg	Agent	2/19/08
4. Typed Name: Michael Kellogg		

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy



NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated
MAR 15 2007

PROTHOR SC 2

For use only by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

Active Ingredient:	By Wt.
Imidacloprid	21.4%
Other Ingredients:	78.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-4 EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

Fayetteville, NC 28303

FIRST AID

If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing end wash before reuse. Keep children end pets away from treated erea until dry.

Personal Protective Equipment: All pesticide handlers (mixers, loaders and epplicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and chemical-resistant gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventileted spece or when applying as a termiticide by rodding or sub-slab injection.

Termite Control Treatment: When treating edjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate weter when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme cere must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

General

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician should be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes*. The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foreging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around walls and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 2* or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC 2*. Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes."

Prothor SC may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 2 to add
0.05%	25	6.9
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
	1000	275.0 (2 gallons + 19 ounces)
0.10%	25	13.8
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = A x 0.275

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = A x 0.55

Proportional Injector Mixing Table For Prothor SC 2

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes should not extend below the footing. When trenching, the tranch along the outside foundation should be about 6 inches in width and 6 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Rodding in trench followed by flooding of tranch and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated area. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to avoid puncturing these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the tranch or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes should be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes should be spaced so as to achieve a continuous chemical barrier but in no case farther apart than 12 inches. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

Note: When drilling veneer walls, care should be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Note: Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

6.90 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 13.80 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 2 to Add to Water	Expansion Ratios
25	1.0	6.90 ounces	25:1
25	2.5	6.90 ounces	10:1
25	5.0	6.90 ounces	5.:1
50	1.0	13.80 ounces	50:1
50	2.5	13.80 ounces	20:1
50	5.0	13.80 ounces	10:1

*Add the foaming agent manufacturer's recommended amount of foaming agent to solution after water and PROTHOR SC 2 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 2 before mixing or using with PROTHOR SC 2.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 2 (see Foam Mixing Instructions) may be converted into a predetermined amount foam according to the foaming agent and foaming equipment manufacturer's recommendations. Verify that the foaming agent is compatible with PROTHOR SC 2.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the recommended volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 2 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however avoid excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

ATTENTION

Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

Revised 3/07

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Michael Kellogg
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136'th Street N.W.
Gig Harbor, WA 98332

MAR 15 2007

Dear Mr. Kellogg:

Subject: Labeling Amendment; Corrected Labeling
Prothor SC 2
EPA Registration No. 83923-4
Submission Date: March 14, 2007

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this label, please contact me at (703) 306-0415.

Sincerely yours,

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

PROTHOR SC 2

For use only by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

Active Ingredient:	**By Wt.**
Imidacloprid	21.4%
Other Ingredients:	78.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-4 EPA Est. XXXXX-XX-XXX

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.
Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton. After the product is diluted in accordance with label directions for use, shirt, pants, socks and chemical-resistant gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Termite Control Treatment: When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

General

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician should be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes.* The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC 2* or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC 2.* Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes."

Prothor SC may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 2 to add
0.05%	25	6.9
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
	1000	275.0 (2 gallons + 19 ounces)
0.10%	25	13.8
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = A x 0.275

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = A x 0.55

Proportional Injector Mixing Table For Prothor SC 2

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Concrete Slab On Ground or Basements

Apply an overall treatment to the entire surface of soil or other substrate to be covered by the slab including areas to be under carports, porches, basement floors and entrance platforms. Apply solution uniformly at the Prescribed Horizontal Barrier Rate. If fill under slab is gravel or other coarse aggregate, apply at the rate of 1.5 gallons per 10 square feet or sufficient volume of solution to uniformly cover each 10 square feet. To provide a uniform treated zone in soil at critical areas such as along the inside of foundation walls, and around plumbing, bath traps, utility services, and other features that will penetrate the slab, apply solution at the Prescribed Vertical Barrier Rate to these areas.

After completion of grading, make an application by trenching or trenching and rodding around the slab or foundation perimeter and applying solution at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench. When rodding, rod holes must be spaced in a manner that will allow for a continuous chemical treated zone to be deposited along the treated area (place holes 12 or fewer inches apart). Rod holes should not extend below the footing. When trenching, the trench along the outside foundation should be about 8 inches in width and 8 inches in depth. Use a low pressure spray (not to exceed 25 PSI at the treatment tool when the valve is open) to treat the soil which will be placed into the trench after rodding. Mix the spray solution with soil as it is being placed in the trench. When treating voids in hollow masonry units, apply 2 gallons of solution per 10 linear feet of wall. Apply solution so it will reach the footing by injecting into the lower areas of the wall, just above the floor or footing.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat the soil at the Prescribed Vertical Barrier Rate from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing. Rodding in trench followed by flooding of trench and treatment of backfill may provide a better chance of achieving a continuous treated zone than using soil rodding alone to establish a vertical treated zone.

Crawl Spaces

Application must be made by trenching or trenching and rodding downward along the inside and outside of foundation walls, around piers, interior supports in contact with the soil, plumbing, and utility services at the Prescribed Vertical Barrier Rate. Rodding may be done from the bottom of a shallow trench to the top of the footing or a minimum of 4 feet. When rodding, rod holes must be spaced in a manner that will allow for a continuous treated zone to be deposited along the treated area. Rod holes should not extend below the footing. When trenching, the trench should be about 6 inches wide and 6 inches deep. Use a low pressure spray to treat soil which will be placed in the trench, mixing the spray solution with soil as it is being placed in the trench.

Hollow Block Foundations and Voids

Hollow block foundations or voids in masonry resting on the footing may be treated to create a continuously treated zone in the voids at the footing. Apply 2 gallons of solution per 10 linear feet to the lower part of the void so that it reaches the top of the footing or soil. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site (refer to Precautionary Statements). Do not allow people or pets to contact or to reoccupy the contaminated areas of the structure until the clean up is completed.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to avoid puncturing these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes should be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Treat all existing cracks and cold, construction or expansion joints. Also, treat around bath traps, plumbing and utility services which penetrate the slab. Apply 4 gallons per 10 lineal feet per foot of depth to provide a uniform treated zone.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes should be spaced so as to achieve a continuous chemical barrier but in no case farther apart than 12 inches. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1. Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

Note: When drilling veneer walls, care should be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Note: Not for use in voids insulated with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Construction practices, soil subsidence and other factors may create situations in which a continuous treated zone cannot be achieved using conventional treatment alone. In these situations or wherever else it becomes necessary, conventional application methods can be supplemented through the use of foam (created by the use of foam generating equipment, or similar devices) to create a continuous treated zone. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient applied per unit of area is equivalent to that which would be applied according to a solution-only application at the recommended rate. At least 75% of the gallons of PROTHOR SC 2 must be applied as a typical liquid treatment. The remaining 25% or less gallons can be delivered to appropriate locations using a foam application. The application of the correct volume and amount of active ingredient are essential to the application of an effective treatment.

Foam Mixing Instructions

6.90 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 25 gallons of foam containing 0.05% active ingredient. 13.80 ounces of PROTHOR SC 2 can be mixed with between 1 and 5 gallons of water and expanded to create 50 gallons of foam containing 0.05% active ingredient. See the Foam Mixing and Expansion Table below for foam mixing and expansion ratios.

Foam Mixing and Expansion Table (all mixes produce 0.05% active ingredient foam)

Gallons of Foam Desired	Gallons of Water*	Amt. of PROTHOR SC 2 to Add to Water	Expansion Ratios
25	1.0	6.90 ounces	25:1
25	2.5	6.90 ounces	10:1
25	5.0	6.90 ounces	5.:1
50	1.0	13.80 ounces	50:1
50	2.5	13.80 ounces	20:1
50	5.0	13.80 ounces	10:1

*Add the foaming agent manufacturer's recommended amount of foaming agent to solution after water and PROTHOR SC 2 are mixed. Verify that the foaming agent is compatible with PROTHOR SC 2 before mixing or using with PROTHOR SC 2.

Foam Application Use Directions

Using foam generating equipment, a solution of PROTHOR SC 2 (see Foam Mixing Instructions) may be converted into a predetermined amount foam according to the foaming agent and foaming equipment manufacturer's recommendations. Verify that the foaming agent is compatible with PROTHOR SC 2.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume (see Foam Mixing Instructions). Then add to the solution the recommended volume of foaming agent according to the foaming agent manufacturer's directions.

Foam applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces. Use dispersion tips and application methods appropriate to the site. Always apply a sufficient volume of PROTHOR SC 2 in the form of a foam alone or in combination with a liquid solution to provide a continuous treated zone at the recommended rate for specific application sites.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption may be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment administered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as a supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications are defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however avoid excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

ATTENTION

Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

PROTHOR is a registered trademark of Ensystex IV, Inc.

Revised 3/07

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg. Number:	Date of Issuance:
83923-4	

Term of Issuance: Conditional

Name of Pesticide Product:
Prothor SC 2

NOTICE OF PESTICIDE:
_x_ Registration
__ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Mr. Michael Kellogg
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th Street, NW
Gig Habor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

egistration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).

1. Revise the EPA Registration Number to read, EPA Reg. No. "83923-4".

Signature of Approving Official:	Date:
Dani Daniel Insecticide-Rodenticide Branch Registration Division (7505P)	MAR 6 2007

EPA Form 8570-6

2. Under the Personal Protective Equipment you must use the Agency's gloves statement which read: **"Chemical resistant gloves made of waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyethylene, polyvinyl chloride or viton."**

3. Make the following changes to the "Conditions of Sale and Warranty" statement:

- Under the heading entitled **"Conditions of Sales"** change the word **"should"** to **"must"**. The sentence would then read **"must be followed carefully"**.

- Under the heading beginning **"Limitations of Liability"** At the beginning of the sentence, add the statement **"To the extent consistent with applicable law"**...

4. Submit two copies of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sect. 6(e). Your release for shipment of the product constitute acceptance of these conditions.

5. Submit to the Agency the required one year storage stability (830.6317) and corrosion characteristics (830.6320) studies for the proposed product under warehouse conditions. The studies may be carried out concurrently. It is recommended that observations be made at 0, 3, 6, 9, and 12 months.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact me at (703) 305-5409.

Enclosure:

ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAR 6 2007
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 83923-4

PROTHOR SC 2

For use only by individuals/firms licensed or registered by the state to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your state prior to use of this product.

For prevention or control of subterranean termites in and around residential, commercial, industrial, institutional and public structures and buildings.

Active Ingredient:	By Wt.
Imidacloprid	21.4%
Other Ingredients:	78.6%
TOTAL:	100.0%

Contains 2 pounds of imidacloprid per gallon

Shake well before using

EPA Reg. No. 83923-X EPA Est. XXXXX-XX-XXX

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

Fayetteville, NC 28303

FIRST AID	
If swallowed	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	• Hold eye open and rise slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-866-367-8467 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat the patient symptomatically.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse. Keep children and pets away from treated area until dry.

Personal Protective Equipment: All pesticide handlers (mixers, loaders and applicators) must wear long-sleeved shirt and long pants, socks, shoes and water-proof gloves. After the product is diluted in accordance with label directions for use, shirt, pants, socks and water-proof gloves are sufficient protection. All pesticide handlers must wear protective eyewear, such as goggles, faceshield or safety glasses, when working in a non-ventilated space or when applying as a termiticide by rodding or sub-slab injection.

Termite Control Treatment: When treating adjacant to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the cleanup is completed.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. Extreme care must be taken to avoid runoff. Apply only to soil or other fill substrate that will accept the solution at the specified rate. Do not treat soil that is water-saturated or frozen or in any conditions where run-off or movement from the treated area (site) is likely to occur.

Physical and Chemical Hazards

Do not apply this product or solutions of this product around electrical equipment, such as electrical conduits, motor housings, junction boxes, switch boxes, etc. due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concantrate or dilute material into food or drink containers. Preferebly store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site (in the treatment area) or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex IV at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistanca.

APPLICATION FOR CONTROL OF SUBTERRANEAN TERMITES

General

PROTHOR SC 2, in the form of a dilute insecticidal solution, prevents and controls subterranean termite infestations in and around structures and other items by creating a continuous chemically treated zone (horizontal and/or vertical as needed) between the wood and other cellulose material in a structure and termite colonies in the soil. In order to establish a zone between the wood in the structure and the termites in the soil, adequately disperse the solution of this product in the soil.

To effectively control subterranean termites with this product, the service technician should be familiar with current subterranean termite control practices including trenching, rodding, sub-slab and void injection, soil surface fan spraying and excavated soil treatment. Correct use of these techniques is necessary to effectively control infestations by subterranean termites such as *Coptotermes, Heterotermes and Reticulitermes.* The service technician should consider the biology and behavior of the termite specie(s) to be controlled to determine which control practices to use.

Treatment standards and procedures for subterranean termite control may vary due to regulations, water table level, structure design, soil types, construction practices and other factors. For advice concerning current control practices with respect to specific local conditions, consult resources in structural pest control and state cooperative extension and regulatory agencies. Follow all federal, state and local regulations and treatment standards for protection of a structure from subterranean termites. All treatment directions contained in this label may not be necessary to provide adequate protection against termites. In some circumstances, it may be necessary to supplement the use of PROTHOR SC 2 with other termiticide products such as termite baits or products approved for direct or injection application to wood to adequately protect the property.

Effective termite control may also include mechanical alteration of the structure. Elimination of leaks or points of moisture accumulation within or on the exterior of the structure that result in an increase in the moisture content of wooden structural components is advised. Removal of non-essential cellulose containing materials that are in contact with the ground under or around the structure can reduce termite foraging in the area.

PROTHOR SC 2 is labeled for use against subterranean termites as a 0.05% to 0.10% solution in water. Generally, the 0.05% rate is used for typical control situations. When severe or persistent infestations are occurring, a 0.10% solution may be more appropriate. When difficult or problem soils or construction types are encountered, it may be necessary to use 0.10% PROTHOR SC 2 mixed in reduced volumes of water.

Avoid contamination of water supplies due to backflow under reduced water system pressure by using anti-backflow equipment or procedures to prevent siphoning of any solution back into a water supply. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen. Do not treat while precipitation is occurring. Do not apply solution to an area or site if the soil at the area or site is in such a state or condition that runoff or movement of the solution from the treated area or site is likely to occur. Structures that contain wells or cisterns within the foundation of the structure can only be treated using the treated backfill method described in the treatment around wells and cisterns section of this label. Consult state and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

Dilution and Mixing of PROTHOR SC 2

Use rates for PROTHOR SC 2 are expressed and the solution is mixed according to the percentage (%) concentration it forms when mixed in water. Use the *Mixing Table for PROTHOR SC* 2 or alternately the formulas below to determine the amount of PROTHOR SC 2 to add to any quantity of water.

To mix, measure out the required amount of PROTHOR SC 2 according to the *Mixing Table for PROTHOR SC* 2. Pour this amount of PROTHOR SC 2 into the spray tank as it is being filled with water with the agitator operating.

Mix PROTHOR SC 2 to create a use dilution in the following manner:

1. Fill tank 1/4 to 1/3 full.
2. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose.
3. Add appropriate amount of PROTHOR SC 2.
4. Add remaining amount of water.
5. Let pump run and allow recirculation through the hose for 2 to 3 minutes."

Prothor SC may also be mixed into full tanks of water, but substantial agitation is required to ensure uniformity of the solution.

Mixing Table for PROTHOR SC 2

Solution Percentage Concentration Desired	Gallons of Finished Solution Desired	Fluid Ounces of PROTHOR SC 2 to add
0.05%	25	6.9
	50	13.8
	100	27.5
	500	138 (1 gallon + 10 ounces)
	1000	275.0 (2 gallons + 19 ounces)
0.10%	25	13.8
	50	27.5
	100	55.0

Calculating an Amount of PROTHOR SC 2 to Mix

To mix any amount of PROTHOR SC 2 determine:

A = Gallons of water into which PROTHOR SC 2 will be mixed. Express any partial gallons as decimal fractions (1/2 = .5).

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.05% = A x 0.275

Fluid ounces of PROTHOR SC 2 to add to A gallons for 0.10% = A x 0.55

Proportional Injector Mixing Table For Prothor SC 2

Solution Percentage Concentration Desired	Injector Volume (fluid ounces per gallon)
0.05%	0.3
0.10%	0.6

Application Volume

To provide maximum control and protection against termite infestation, apply the specified volume of the finished water solution containing the specified amount of PROTHOR SC 2 as set out below or as otherwise directed in this label.

Prescribed Horizontal Barrier Rate: Unless otherwise directed, horizontal barriers are created by applying a 0.05% to 0.10% solution at a rate of one gallon of solution per 10 square feet.

Prescribed Vertical Barrier Rate: Unless otherwise directed, vertical barriers are created by applying a 0.05% to 0.10% solution at a rate of four gallons of solution per 10 linear feet per foot of depth.

Adjustments to Application Volume

If soil will not accept the labeled application volumes, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: Large reductions of application volume reduce the likelihood of obtaining a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved. When volume is reduced, the spacing of holes created for sub slab injection and soil rodding may need to be reduced to account for decreased dispersion of the solution in the soil.

For example, adjust the amount of solution applied to deliver a horizontal barrier of 10 square feet from 1 gallon to as low as 0.5 gallons and as high as 2 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 square feet.

For example, adjust the amount of solution applied to deliver a vertical barrier 10 feet long by one foot deep from 4 gallons to as low as 2 gallons and as high as 8 gallons while maintaining the amount of PROTHOR SC 2 applied per 10 linear feet.

PRE-CONSTRUCTION TREATMENT

All Structures

Pre-construction treatment: Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party, of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Effective control of subterranean termites can be accomplished during construction by using a 0.05% solution of PROTHOR SC 2 to establish vertical and/or horizontal barriers between the structure and the soil as directed. To meet current termite proofing requirements, follow the procedures in the latest edition of the Housing and Urban Development Minimum Property Standards.

Horizontal Barriers Under Slabs on Ground Including Basements

Create a horizontal barrier on the entire surface of soil or substrate that will be covered by a slab, including, but not limited to, slab floors, garages, carports, basements, porches and entrance platforms by treating the soil or substrate with the solution at the Prescribed Horizontal Barrier Rate.

If the fill under the slab is a coarse material such as washed gravel, make sure that a sufficient enough amount of dilution is applied that the solution reaches the soil beneath the fill.

Apply solution using a coarse spray nozzle. If the slab over the treated area will not be poured on the same day as the application (and there are no foundation walls in place around the treated soil) cover treated soil with a water-proof barrier such as polyethylene sheeting.

Vertical Barriers

Create a vertical barrier along the inside and outside of foundation walls, around piers, plumbing and utility service entrances and other points of possible future termite access and entry by treating the soil at these points at the Prescribed Vertical Barrier Rate. When trenching and rodding into the trench, or trenching alone, it is important that the solution reaches the top of the footing. Rod holes must be spaced so as to achieve a continuous termiticidal barrier, but they should in no case be more than 12 inches apart. Trenches need not be wider than 6 inches. Mix the solution into the soil as it is being replaced in the trench. Care should be taken to avoid washing soil out from around footings thereby undermining the stability of the structure. An inside vertical barrier may not be required for a monolithic slab.

If distance from final grade to top of footing will be less than four feet, it is permissible to wait until final grade is established to apply the vertical barrier. When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator in time to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Hollow Block Foundations and Voids

Hollow block foundations and voids may be treated at a rate of 2 gallons of solution per 10 linear feet to create a continuous treated zone within the voids at the footing.

POST CONSTRUCTION TREATMENT

All Structures

Do not apply treatment until the identity and location of all wells, radiant heat pipes, water and sewer lines, electrical conduits and sub-slab heating and air conditioning ducts is established. Caution must be taken to avoid puncturing these elements and/or injecting solution into them. All holes in commonly occupied areas into which material has been applied must be plugged. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Vertical Barrier Depth: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements and treat at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls and treat at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the soil type, degree of compaction, and location of termite activity. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Structures Containing Concrete Slabs on Ground (Monolithic/Floating/Supported) Including Basements

To make an application beneath existing slabs, it may be necessary to drill holes in the slab or adjacent foundation and to apply solution. Holes should be spaced such that when treatment is applied through them, a continuous treated zone is applied beneath the slab.

Vertical Barriers Along Exterior of Foundation Walls: Trench and rod into the trench or trench along the outside of foundation walls and treat at the Prescribed Vertical Barrier Rate to the depth specified under Vertical Barrier Depth. Where physical obstructions such as concrete walkways adjacent to foundation elements or soil type and/or conditions make trenching prohibitive, treatment may be made by rodding alone.

Vertical Barriers Along Interior of Foundation Walls: Vertical barriers may be established on the interior side of foundation walls by sub-slab injection of the solution at the Prescribed Vertical Barrier Rate. Injection openings can be drilled either vertically through the slab along the interior of the foundation wall or horizontally from the exterior through the foundation wall low enough on the wall to allow for the deposition of the solution beneath the slab along the interior side of the foundation wall. Drill holes should be spaced so as to achieve a continuous chemical barrier but in no case farther apart than 12 inches. Special care must be taken to distribute the solution evenly. Vertical barriers may also be established beneath the slab along both sides of interior footing-supported walls, one side of interior partitions and along all cracks and expansion joints and utility service entrances and bath traps.

Horizontal Barriers Beneath Slabs on Ground: Create a horizontal barrier by treating at the Prescribed Horizontal Barrier Rate beneath slabs by either drilling and long rodding from the exterior or by grid pattern drilling and injection vertically through the slab. Long rodding should be used only when grid pattern drilling and injection and horizontal short rodding and injection cannot be used to deliver the sub slab treatment.

Bath Traps: Exposed soil beneath and around areas where plumbing and utility services penetrate the slab should be treated at the rate of 3 gallons of solution per square foot of soil.

Structures Containing Accessible Crawl Spaces

For crawl spaces, including sealed underfloor spaces that serve as heating and air conditioning plenums, apply vertical termiticide barriers at the rate of 4 gallons of solution per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction section of the label if situations are encountered where the soil will not accept the full application volume.

1 Rod holes and trenches must not extend below the bottom of the footing.

2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case more than 12 inches apart.

3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The solution must be mixed with the soil as it is replaced in the trench.

4. When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all solution has been absorbed by the soil.

Subterranean termites can be prevented from constructing shelter tubes directly between the crawl space soil surface and overhead crawl space wooden members by the application of an overall treatment of the crawl space soil surface at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

PROTHOR SC 2 can be applied as a general fan spray within crawl spaces directly to swarming and exposed worker termites at the Prescribed Horizontal Barrier Rate using a 0.05% to 0.10% solution of PROTHOR SC 2.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as a plenum.

Structures Containing Inaccessible Crawl Spaces

For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate, if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one, or a combination of the following two methods.

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of solution per 10 square feet overall using a nozzle pressure of less than 25 p.s.i. and a coarse application nozzle (e.g., Delavan Type RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). For an area that cannot be reached with the application wand, use one or more extension rods to make the application to the soil. Do not broadcast or power spray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of solution per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many states have smaller intervals, so check state regulations which may apply.

When treating crawl spaces used as plenums, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Note: Overall treatments (treatments where chemical is applied more than 18 inches from the foundation walls, piers and pipes) should not be applied within a crawl space that serves as e plenum.

Masonry Voids

Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the erea to be treated. Apply at the rate of 2 gallons of solution per 10 linear feet of footing using a nozzle pressure of less than 25 p.s.i. When using this treatment access holes must be drilled below the sill plate and should be es close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined: Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the clean-up is completed.

Note: When drilling veneer walls, care should be taken to not drill beyond the depth of the void behind the veneer into another construction layer behind the veneer. It is however permissible to drill through the veneer and into concrete blocks behind the veneer and to treat the veneer and the concrete blocks at the same time.

Note: Not for use in voids insuleted with rigid foam.

TREATMENT OF STRUCTURES WITH WELLS AND CISTERNS

Do not contaminate wells or cisterns.

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:

a. Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.

b. Treat the soil at the rate of 4 gallons of dilute solution per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. See *Mixing Directions for PROTHOR SC 2 for Use as a Termiticide* section of the label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.

c. After the treated soil has absorbed the solution, replace the soil into the trench.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from a well to the structure, if the pipe(s) enter the structure within 3 feet of grade.

2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These preceutions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurfaca drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.

3. When appropriate (for example, on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

FOAM APPLICATION

PROTHOR SC 2, in the form of a foam, can be used to deliver PROTHOR SC 2 as a termiticide any time it appears likely this form of delivery will improve the dispersal of PROTHOR SC 2 into and within the intended target area. Foam can be particularly useful to deliver PROTHOR SC 2 where it either cannot be depended upon to be delivered as just a solution or due to a need to reduce the amount of water used in order to avoid water damage to the target or adjacent areas. In some situations, for example under some slabs, a solution cannot be depended upon to disperse as completely as a foam because of deflection of the liquid stream or some other structurel obstacle or defect.

Depending on the circumstances, foam applications of PROTHOR SC 2 may be used alone or in combination with liquid solution applications, provided that the cumulative amount of active ingredient per unit of area applied is equivalent to that which would be contained in a 0.05% to 0.10% solution-only application appliad to the same area.

Using foam generating equipment, a solution of PROTHOR SC 2, renging in concentration from 0.05% to 0.10%, may be converted into a foam according to the foaming agent and foaming equipment manufacturer's recommendations.

First, form a solution of PROTHOR SC 2 of the appropriate percentage concentration and volume. Then add the recommended volume of a foaming agent. Verify that the foaming agent is compatible with PROTHOR SC 2.

Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids, structural voids or other similar voids, under slabs, stoops, porches or to the soil in crawlspaces.

RETREATMENT

Retreatments for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation or landscaping and/or evidence of the breakdown of the termiticide barrier in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this product's labeling. The timing and type of these retreatments will vary, depending on factors such as termite pressure, soil types, soil conditions and other factors which may reduce the effectiveness of the barrier. Retreatment may be made as either a spot or complete treatment.

Retreatments in the absence of reinfestation or barrier disruption mey be performed five or more years after a complete treatment was last applied to the structure. Such retreatments should be made based on the judgment of the applicator that such retreatment is necessary to ensure the continued protection of the structure from termite attack. In making such judgment, the applicator should take into account the expected useful life of the last treatment edministered (based on efficacy testing) and conditions specific to the structure in question that may increase it vulnerability to attack.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or treated zone disruption has occurred.

APPLICATION IN CONJUNCTION WITH BORATES AND TERMITE BAITS

Spot only applications of PROTHOR SC 2 can be used as e supplement to borate treatments and termite baiting system installations that are labeled for stand alone protection against termite attack. Stand alone product is defined as a product that is labeled for the protection of a structure when applied alone without the use of other termite control products. Spot only applications era defined as the use of PROTHOR SC 2 according to any of the permitted and applicable post-treatment application techniques contained in this label, alone or in combination, to the extent needed or deemed necessary or useful as an adjunct to the application of a standalone product.

APPLICATION TO PROTECT UNDERGROUND ITEMS FROM SUBTERRANEAN TERMITE ATTACK

To protect components installed underground such as wires, conduits, cables and pipes buried in soil against termite attack, create an envelope of PROTHOR SC 2 treated soil around the components along the entire underground length of the component. First, treat soil through which components will be run with 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 2 gallons of solution per 10 linear feet. Install components, laying them on the treated soil. Cover components with untreated soil and then treat this covering soil using the same percent solution at 2 gallons of solution per 10 linear feet.

Underground components to be protected may be located within the foundation of a structure or outside of a structure such as within a utility right of way, for example. Do not treat items that are electrically energized at the time of application. If the soil will not absorb the indicated amount of solution, as little as 1 gallon of 0.10% solution per 10 linear feet can be used. Treat points where services emerge from the ground at a rate of 1 to 2 gallons of solution at the point of emergence.

APPLICATIONS TO PROTECT POLES, POSTS AND OTHER WOODEN ITEMS FROM SUBTERRANEAN TERMITE ATTACK

PROTHOR SC 2 can be used to protect the below ground portions of wooden structural components from termites. Form a treated zone around components below ground by vertically rodding the soil around their perimeter to a depth of six inches below their maximum depth of placement in the soil and applying a 0.05% to 0.10% solution of PROTHOR SC 2 at a rate of 0.4 gallons of solution per linear foot of perimeter around the component per foot of treated depth. Measure the perimeter of the component six inches from the outside of the component.

APPLICATIONS TO TERMITE CARTON NESTS LOCATED IN ABOVE GROUND WALL VOIDS

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 directly into above ground termite carton nests including nests located in wall voids using a directional injector. Apply as a solution or foam under pressure to distribute solution thoroughly throughout the nest. It may be necessary to inject solution at one or more points and at varying depths within the nest to adequately distribute solution within the interior of the nest.

EXTERIOR APPLICATION FOR ANT CONTROL

Apply a 0.05% to 0.10% solution of PROTHOR SC 2 to the exterior of the structure as a general surface, spot, crack and crevice or wall void treatment. Apply at points where ants may enter the structure or crawl and hide including exterior surfaces, around doors and windows, under eaves, attic and foundation vents, utility entrances and cracks in the surface of the structure. Spray solution or foam into voids where ants or their nests are present. Apply a volume of solution sufficient to cover the target surface(s) however avoid excess dripping or runoff from vertical or overhead surfaces.

Treat soil, turf or ground cover (flower, shrub and plant beds) adjacent to the structure where ants are trailing or may find food. Ants tunneling in the soil may be controlled by applying a 0.05% to 0.10% solution of PROTHOR SC 2 as a drench or soil injection along the edge of foundations or other hard surfaces such as driveways. Apply in a volume sufficient to treat or cover the soil or foliage.

Inject a 0.05% to 0.10% solution of PROTHOR SC 2 in the form of a spray or foam into tree cavities or other parts of trees where ant nests are located.

Do not treat more often than once per month. Do not allow residents or pets into the immediate area during application or allow them to make contact with treated areas until spray has dried.

It is recommended to remove or prune away shrubbery, bushes and tree branches touching the structure. Vegetation touching the structure may offer a route of entry for ants into the structure that allow ants to inhabit the structure without coming in contact with the treatment. If nests are found, direct treatment of nests with PROTHOR SC 2 can be made.

Do not use PROTHOR SC 2 against native fire ants, imported fire ants, pharaoh ants or harvester ants. Limit applications for control of carpenter ants to treatment of non-wooden parts or surfaces of structures.

ATTENTION

Do not apply to soil in areas where edible plants may be planted. Do not plant edible plants in soil that has been treated with PROTHOR SC 2.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and should be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent permitted by law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Werranty and Liability may not be amended by any oral or written agreement.

Revised 10/06

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060, Approval expires 2-28-95

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [✓] **Registration**
- [ ] **Amendment**
- [ ] **Other**

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
~~83293-~~ 83923-U	V. Eagle	[✓] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Ensystex IV, Inc. / Prothor SC 2	01	

5. Name and Address of Applicant *(Include ZIP Code)*
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. 432-1331
Product Name Premise 2 Insecticide

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [ ] Notification - Explain below.
- [ ] Final printed labels in repsonse to Agency letter dated _____
- [✓] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application falls under Category R30 (85: New product – Me-Too, Fast Track) as only product chemistry data are being submitted and the cite-all option under the selective method is being used to support product specific acute toxicity and efficacy data requirements. In addition, the technical source of active ingredient is based on a registered source of supply. The fee due is $1050 and the decision timeline is 3 months. Please email or fax the fee for service invoice to: fees@PyxisRC.com or 253-853-5516.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [✓] No	[ ] Yes [✓] No	[ ] Yes [✓] No	[ ] Metal [✓] Plastic [ ] Glass [ ] Paper [ ] Other (Specify)
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[ ] Label [✓] Container	2.15 gallon	[✓] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [✓] Lithograph Paper glued Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Michael Kellogg	Agent	(253) 853-7369

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingllly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	4. Typed Name	5. Date
Michael Kellogg	Agent	Michael Kellogg	11/13/06

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

November 13, 2006

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (REGFEE)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Prothor SC 2 (EPA Reg. No. 83923-)
Application for New Pesticide Registration

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. we are submitting an application for registration of Prothor SC 2, an end-use product containing imidacloprid as the active ingredient. In support of this application, we submit the following documents:

1. Application for Registration (EPA Form 8570-1)
2. Confidential Statement of Formula
3. Formulators Exemption Statement (EPA Form 8570-27)
4. Five (5) copies of the proposed labeling
5. Certification with Respect to Citation of Data (EPA Form 8570-34)
6. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
7. Public File Copy of the Data Matrix (EPA Form 8570-35)
8. Letter of Authorization
9. Product Specific Data:

Volume 1	830.1550, 830.1600, 830.1650, 830.1670, 830.1750, 830.1800	Kellogg, M. Product Identity and Composition, Description of the Materials Used, Description of the Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Analytical Methods to Verify Certified Limits for Prothor SC 2.
Volume 2	830.6303, 830.6314, 830.7000, 830.7100, 830.7300	Wo, C. Prothor SC 2; Physical and Chemical Characteristics: Physical State, Oxidation/Reduction, pH, Viscosity, and Density/Relative Density.
Volume 3	830.6302, 830.6304, 830.6313, 830.6315, 830.6316, 830.6319, 830.6321, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550-830.7570, 830.7840-830.7860, 830.7950	Kellogg, M. Waiver Request for Certain Data Requirements for Prothor SC 2.

Ensystex IV, Inc. believes its product, Prothor SC 2, is substantially similar to a currently registered product (EPA Reg. No. 432-1331). Ensystex IV, Inc. believes this application falls under Category R30 (85: New product – Me-Too, Fast Track) as only product chemistry data are being submitted to support the application for registration and the cite-all option under the selective method is being used to support product specific acute toxicity and efficacy data requirements. In addition, the technical source of active ingredient is based on a registered source of supply and therefore, Prothor SC 2 qualifies for Formulators Exemption for imidacloprid generic data requirements.

We trust you will find this application complete. However, please feel free to contact me if you have any questions or need any additional information.

Sincerely,

Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex IV, Inc.

ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensytex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary

NORMA S. STACKLEY NOTARY PUBLIC CUMBERLAND CO., N.C.

N. Stackley, Notary Public
My commission expires 4-21-06

Form approved. OMB No. 2070-0060, 2070-0094, 2070-0107, 2070-0122, 2070-0164.

EPA

United States
Environmental Protection Agency
Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address

Ensystex IV, Inc.
2709 Breezewood Avenue
Fayetteville, NC 28303

EPA File Symbol/Registration Number
83293-

Product Name
Prothor SC 2

Date of Confidential Statement of Formula *(EPA Form 8570-4)*
11/07/2006

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Imidacloprid

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☑ (A) An accurate Confidential Statement of Formula *(EPA FORM 8570-4)* for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Imidacloprid	[redacted]	

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg / Agent	11/13/06

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 – EPA
Copy 2 - Applicant copy

Product ingredient source information may be entitled to confidential treatment

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ensystex IV, Inc.; 2709 Breezewood Ave.; Fayetteville, NC 28302; (800) 753-2847	EPA Registration Number/File Symbol 83923-4
Active Ingredient(s) and/or representative test compound(s) Imidacloprid	Date November 13, 2006
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Nonfood, Domestic Outdoor	Product Name Prothor SC 2

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	☑ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☑ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
Michael Kellogg	11/13/06	Michael Kellogg; Agent

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Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

11-15-06

DATA MATRIX

Date November 13, 2006

EPA Reg No./File Symbol 83923-

Applicant's/Registrant's Name & Address

Ensystex IV, Inc.
2709 Breezewood Avenue
Fayetteville, NC 28303

Product

Prothor SC 2

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements					
830.1550	Product Identity and Composition	Volume 1	Ensystex IV, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	Volume 1	Ensystex IV, Inc.	OWN	
830.1620	Description of Production Process				Not required[1]
830.1650	Description of Formulation Process	Volume 1	Ensystex IV, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	Volume 1	Ensystex IV, Inc.	OWN	
830.1700	Preliminary Analysis				Not required[2]
830.1750	Certified Limits	Volume 1	Ensystex IV, Inc.	OWN	
830.1800	Enforcement Analytical Method	Volume 1	Ensystex IV, Inc.	OWN	
830.6302	Color				Not required[3]
830.6303	Physical State	Volume 2	Ensystex IV, Inc.	OWN	
830.6304	Odor				Not required[3]
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Not required[3]
830.6314	Oxidation/Reduction: Chemical Incompatibility	Volume 2	Ensystex IV, Inc.	OWN	
830.6315	Flammability				Not required[4]
830.6316	Explodability				Not required[5]

Signature

Name and Title
Michael Kellogg, Consultant

Date
11/13/06

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Product

Prothor SC 2

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability				PRN 92-5[6]
830.6319	Miscibility				Not required[7]
830.6320	Corrosion Characteristics				See endnote[6]
830.6321	Dielectric Breakdown Voltage				Not required[8]
830.7000	pH	Volume 2	Ensystex IV, Inc.	OWN	
830.7050	UV/Visible Absorption				Not required[3]
830.7100	Viscosity	Volume 2	Ensystex IV, Inc.	OWN	
830.7200	Melting Point/Melting Range				Not required[3]
830.7220	Boiling Point/Boiling Range				Not required[3]
830.7300	Density/Relative Density/Bulk Density	Volume 2	Ensystex IV, Inc.	OWN	
830.7370	Dissociation Constants in Water				Not required[3]
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not required[3]
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Not required[3]
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not required[3]

Signature

Name and Title
Michael Kellogg, Consultant

Date
11/13/06

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Ensystex IV, Inc.
2709 Breezewood Avenue
Fayetteville, NC 28303

Product

Prothor SC 2

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method				Not required[3]
830.7860	Water Solubility, Generator Column Method				Not required[3]
830.7950	Vapor Pressure				Not required[3]
Product Specific Data Requirements – Acute Toxicity					
870.1100	Acute Oral Toxicity: Rat	Cite-All		PAY	
870.1200	Acute Dermal Toxicity: Rat	Cite-All		PAY	
870.1300	Acute Inhalation Toxicity: Rat	Cite-All		PAY	
870.2400	Primary Eye Irritation: Rabbit	Cite-All		PAY	
870.2500	Primary Dermal Irritation	Cite-All		PAY	
870.2600	Dermal Sensitization	Cite-All		PAY	
Product Specific Data Requirements - Efficacy					
810.3500	Premises Treatments	Cite-All		PAY	
810.3600	Structural Treatments	Cite-All		PAY	

Signature

Name and Title
Michael Kellogg, Consultant

Date
11/13/06

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Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 2	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Prothor SC 2 Product Specific Acute Toxicity and Efficacy Data Requirements					
Ensystex IV, Inc. is using the cite-all option under the selective method to satisfy acute toxicity and efficacy data requirements. Ensystex IV, Inc. will make offers-to-pay to the following companies on the data submitters list of September 30, 2006.					
Imidacloprid Product Specific Data Requirements					
Imidacloprid Product Specific Data Requirements	Cite-All		Syngenta Crop Protection, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Nufarm Americas Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer CropScience LP	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Environmental Science	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Corporation	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Gustafson LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Chemical Specialties Inc.	PAY	

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Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 2	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Healthcare LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Mitsui Chemicals America, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Lanxess Corporation	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Albaugh, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Spray Drift Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Dow AgroSciences LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arbor Systems, LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Pet Logic, LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Nufarm, Inc.	PAY	

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Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 2	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Outdoor Residential Exposure Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Agricultural Reentry Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Advanced	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Zelam Ltd.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arborjet	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Residential Exposure Joint Venture (REJV)	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Agricultural Handlers Exposure Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arch Treatment Technologies, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Etigra, LLC	PAY	

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DATA MATRIX

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Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	Product Prothor SC 2	

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Interregional Research Project No. 4	PAY	
Imidacloprid Generic Data Requirements					
Ensystex IV, Inc. qualifies for Formulator's Exemption for imidacloprid generic data requirements.					

Signature	Name and Title	Date
Michael Kellogg	Michael Kellogg, Consultant	11/13/06

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Endnotes for Data Matrix for Prothor SC 2

[1] **830.1620** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product. See 830.1650 for formulation process information.

[2] **830.1700** – This product does not consist solely of the technical grade active ingredient (TGAI) and is not produced by an integrated system, therefore, per OPPTS 830.1700, these data are not required.

[3] **830.6302, 830.6304, 830.6313, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860 and 830.7950** – Per OPPTS 830.1000, these data are not required for the registration of an end-use product.

[4] **830.6315** - This product is not a combustible liquid; therefore these data are not applicable to this end-use product. Please refer to the Confidential Statement of Formula for additional information on the composition of Prothor SC 2.

[5] **830.6316** – This product does not have explosive characteristics; therefore these data are not required. Please refer to the Confidential Statement of Formula for additional information on the composition of Prothor SC 2.

[6] **830.6317, 830.6320** – Ensystex IV, Inc. is currently conducting storage stability and corrosion characteristic studies to satisfy guidelines 830.6317 and 830.6320, respectively for Prothor SC 2. Per PR Notice 92-5, storage stability data are not required to be submitted unless specifically requested by the Agency. OPPTS 830.6317 and 830.6320 guidelines allow the corrosion characteristics study and storage stability study to be conducted simultaneously. Ensystex IV, Inc. will submit these data upon completion. As these studies take over a year to complete, Ensystex IV, Inc. requests that a conditional registration for Prothor SC 2 be granted on the submission of these data.

[7] **830.6319** – Prothor SC 2 is a suspension concentrate formulation and not an emulsifiable concentrate. In addition, the proposed label recommends dilution of Prothor SC 2 with water, not oil; therefore, these data are not applicable nor are these data required.

[8] **830.6321** – This product is not proposed for use around electrical equipment. Therefore, these data are not applicable nor are these data required.